



DERBYSHIRE DALES LOCAL PLAN

KEY ISSUES CONSULTATION

NOVEMBER 2015

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1. INTRODUCTION

What is the Derbyshire Dales Local Plan ?

1.1 The Derbyshire Dales Local Plan is a very important document, as it sets out the overall vision, objectives, and policies for the future development of those parts of the Derbyshire Dales that lie outside the Peak District National Park.

1.2 The plan seeks to address local needs, especially for housing and economic development, while ensuring that the very special qualities of the district's environment – both natural and built – are conserved and where possible enhanced.

1.3 It will set out the District Council's policies and proposals for the use and development of land for the period up to 2033.

Why do we need a Plan?

1.4 The District Council has a legal requirement to prepare a Local Plan and to use it when determining planning applications.

1.5 An adopted Local Plan provides certainty both for local residents and developers about what type and scale of development is needed.

What has happened recently?

1.6 On 13th May 2014, the District Council submitted the Derbyshire Dales Local Plan Pre Submission Draft to the Secretary of State for Independent Examination. The Secretary of State, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended), appointed Inspector Keith Holland BA(HONS) DIPTP MRTPI ARICS to conduct the examination to determine whether the Local Plan was sound.

1.7 The Examination in Public (EIP) of the Derbyshire Dales Local Plan opened on 22nd July 2014 for a period of two days. During the two days of the EIP, the Inspector considered the District Council's position in respect of the Duty to Co-operate and the Objectively Assessed Need for housing.

1.8 The EIP was adjourned at the close of business on 23rd July 2014 pending the preparation of a report by the Inspector in which he would set out his initial findings on the matters discussed. The Inspector's report was received on 29th July 2014.

1.9 A Special Council meeting was held on 2nd October 2014 to consider the Inspector's Report together with a series of options available to the District Council in light of his recommendations.

1.10 Following consideration of the advantages and disadvantages of each option Council resolved to withdraw the Derbyshire Dales Local Plan from the Examination in Public with immediate effect.

Evidence Base

1.11 Although the Derbyshire Dales Local Plan was withdrawn in October 2014, this was on the basis that work would continue on the preparation of a revised Local Plan. Since the withdrawal of the Local Plan, work has been on-going to refresh the evidence base in order to ensure that the policies and proposals that are brought forward are up to date and that the Local Plan will be found sound at a future Examination in Public.

1.12 The refresh of the evidence base has involved the following work:

- Assessment of Housing and Economic Development Needs
- Strategic Housing Land Availability Assessment Update
- Strategic Landscape Sensitivity Assessment
- Settlement Hierarchy
- Review of Infrastructure Needs and Plan Viability (including Community Infrastructure Levy)
- Gypsy and Traveller Accommodation Assessment

Purpose of the Document

1.13 This document has been prepared to set out the Key Issues that have emerged from the refresh of the evidence base that has been undertaken since October 2014 for the purposes of consultation with a wide range of stakeholders including members of the public, parish councils and the development industry.

1.14 The consultation period on the Key Issues runs until 14th December 2015.

1.15 To submit your views on the Key Issues please log on to www.derbyshiredales.gov.uk/LocalPlan and complete the online questionnaire.

2 KEY ISSUES, THEMES AND STRATEGIC OBJECTIVES

Derbyshire Dales Local Plan Pre Submission Draft

2.1 Following the withdrawal of the Derbyshire Dales Local Plan Pre Submission Draft in October 2014 the District Council has taken the opportunity to undertake a review of the key issues, themes and strategic objectives and determine which are the most appropriate to incorporate into the emerging local plan.

2.2 The Derbyshire Dales Local Plan Pre Submission Draft identified the following 10 key issues and grouped them into 3 themes as follows:

Theme: Protecting Peak District Character

1. Protecting and Enhancing the Character and Distinctiveness of the towns and villages in the Plan Area
2. Managing the impact of development on the Peak District National Park
3. Addressing the challenges of climate change

Theme: Supporting the Rural Economy and Enhancing Prosperity

4. Diversifying and Strengthening the Rural Economy
5. Maintaining and Strengthening the Vitality and Viability of Town Centres
6. Enhancing Tourism and Visitor Management

Theme: Promoting Healthy and Sustainable Communities

7. Meeting Local Housing Needs
8. Managing Travel Demand and Improving Accessibility
9. Protecting and Enhancing Community Infrastructure and Local Services
10. Improving Leisure and Recreation Opportunities for Residents and Visitors

2.3 The review of the key issues, themes and strategic objectives has sought to identify which are the most appropriate to incorporate into the emerging local plan by undertaking a comparative analysis of these factors for the local authority areas that generally surround Derbyshire Dales.

Derbyshire Dales Local Plan Pre Submission Draft June 2013 vs The High Peak Local Plan Submission Version 2014

2.4 Initial work on a Joint Core Strategy for Derbyshire Dales and High Peak was carried out over the period 2009-2012 before it was decided to prepare separate local plans.

2.5 As the basis of joint working was that there were many similarities across the two local planning authority area a comparison between the key

issues in the Derbyshire Dales Local Plan Pre Submission Draft and the High Peak Local Plan has been undertaken. This reveals the following analysis:

Key Issues

2.6 Key issues 1 to 3 in the High Peak Local Plan April 2014 are identical with Key issues 1 to 3 in the Derbyshire Dales Local Plan June 2013.

2.7 Key Issue 4 in both the High Peak and the Derbyshire Dales Plans relates to Diversifying and Strengthening the Economy, but the High Peak document also includes the phrase *“and Responding to the Legacy of the Industrial Past”*. There is no difference in the explanatory text to Key Issue 4.

2.8 The description of Key Issues 5 to 10 is identical in the two plans with the exception of Key issue 8 Managing Travel Demand and Improving Accessibility. In the Derbyshire Dales Local Plan the explanatory text includes the following additional sentence at the start of the explanatory text: *“The lack of services and facilities, the disperse nature of settlements across the plan area and the relatively poor public transport network results in a higher than normal dependence upon the use of a private car.”*

Themes

2.9 Both Plans group the key issues into the following three themes:

- Protecting Peak District Character
- Enhancing Prosperity
- Promoting Healthy and Sustainable Communities

Strategic Objectives

2.10 The Derbyshire Dales Local Plan Pre Submission Draft had 15 strategic objectives, whereas the High Peak Plan has 12. Some of the objectives are identical. The table below identifies objectives where there are differences.

	Derbyshire Dales	High Peak
	SO1. To protect and enhance the Green Infrastructure Network	SO1. To protect create and enhance the Green Infrastructure Network
	SO3. To ensure that design of new development is of high quality and that it integrates effectively with its setting and promotes local distinctiveness	SO3. To ensure new development is well designed, promotes local distinctiveness and integrates effectively with its setting.
	SO6. To facilitate development that will support the continued growth and diversification of the	SO6. To welcome development that supports the sustainable growth and diversification of the local economy,

	Derbyshire Dales	High Peak
	local economy.	including the mixed-use development of industrial legacy sites.
	SO7. To support sustainable employment generating development in locations and of a scale appropriate to the plan area.	<i>There is no equivalent objective in the High Peak Plan.</i>
	SO8. To support and promote the areas tourism and cultural sectors, and in particular the development of sustainable tourism initiatives.	SO7: To further develop the Borough's tourism and cultural offer as part of a wider Peak District destination.
	SO9. To strengthen the vitality and viability of the town centres as places for shopping, leisure and tourism	SO8: To strengthen the vitality and viability of town centres by adapting to changing consumer habits in shopping and leisure.
	SO10. To facilitate the required housing growth for the plan area in sustainable and accessible locations	<i>There is no equivalent objective in the High Peak Plan.</i>
	SO11. To ensure that there is an adequate mix of housing types, sizes and tenures to meet the needs of all sectors of the community.	SO9: To provide an appropriate mix of housing types, sizes and tenures in sustainable and accessible locations that meets the needs of all residents in the Borough.
	SO12: To protect existing, and support the delivery of new services, facilities and infrastructure	SO10: To protect existing, and support the delivery of new services, facilities and infrastructure that improve accessibility and connectivity.
	SO13. To support developments that minimise risks to health as a result of crime (or fear of crime), flooding, pollution and climate change.	<i>There is no equivalent objective in the High Peak Plan.</i>
	SO14. To increase opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling.	SO11: To promote opportunities for healthy lifestyles and support developments that minimise risks to health.

	Derbyshire Dales	High Peak
	SO15: To prioritise the efficient use of previously developed land and buildings whilst minimising the use of greenfield land.	SO12: To encourage the efficient use of previously developed land and buildings whilst minimising the use of greenfield land.

Table 1 - Comparison of Strategic Objectives in Derbyshire Dales Local Plan Pre Submission Draft and High Peak Local Plan

2.11 It is considered that the differences between the key issues in Derbyshire Dales and High Peak are minor and reflect a local emphasis.

2.12 A major difference between the two sets of strategic objectives is the inclusion of two objectives relating to development needs for housing and employment in Derbyshire Dales which should be key strategic objectives of the local plan and are worthy of retention. A further difference is the inclusion of an objective in the Derbyshire Dales Local Plan Pre Submission Draft relating to minimising risks to health, again it is considered that this should be retained albeit modified to feature as a slightly broader objective.

The Peak District Core Strategy Development Plan Document October 2011

2.13 The Peak District Core Strategy identifies a large number of objectives but these tend to be much more specific than the strategic objectives set out in the emerging local plans for Derbyshire Dales and the High Peak. However, it is appropriate to consider the following cross-boundary issues identified in the Peak District Core Strategy:

- **Setting of the National Park** - policies and programmes in and around the Peak Sub-area should help secure the conservation and enhancement of the Peak District National Park;
- **Spatial Strategy and relationship of settlements** – the Strategy does not set out a settlement hierarchy as settlements in the National Park exist at a level beneath most conventional hierarchies, and only offer scope for exceptional development requiring a rural location, such as to meet local needs for affordable housing;
- **Recreation and tourism** – role that areas outside the Park can play in accommodating recreational and tourism development to ease pressure within the Park;
- **Renewable energy** – the impact that forms of low carbon and renewable energy can have on the Park’s setting;
- **Housing** – collaboration is needed with authorities within the Housing Market Area;

- **Transport and Communications** – high levels of motorised traffic, high levels of cross-park traffic, high demands for freight transport, demand for improved rail connections, provision of routes for more sustainable modes of transport including walking, cycling, horse riding and by inland waterway.

2.14 Taking these into account, the issues or objectives to be included within the Derbyshire Dales Local Plan could focus more on:

- Highlighting the need to protect the setting of the National Park;
- Recognising the role of the plan area in relieving tourism and recreational pressure on the National Park and;
- Increase opportunities for sustainable travel.

Derbyshire Dales Economic Plan – October 2014

2.15 Growth within the local economy is important to maintaining the economic prosperity of an area. The District Council's Economic Plan identifies four priorities:

- Growing micro businesses;
- Vibrant market towns as employment and service centres;
- Broadband speed and access in rural areas;
- Increasing employment opportunities for young people in rural areas.

2.16 Taking these priorities into account it is recommended below that strategic objective SO6 is amended to reflect the focus on achieving growth of small businesses. Furthermore it is recommended that an additional objective (SO18) be included within the Derbyshire Dales Local Plan to make it clear that priority should be given to the continued delivery of sustainable market towns.

National Planning Policy Framework

2.17 It is considered that the strategic objectives as set out in the Derbyshire Dales Local Plan Pre Submission Draft cover most of the key issues identified in the National Planning Policy Framework. It is considered that an additional objective should be included that provides a positive statement in regard to renewable and low carbon energy development.

Strategic Objectives In Other Local Plans

2.18 A comparison of strategic objectives in several other recently adopted local plans (e.g. Craven, Chester and Cheshire West, East Cambridgeshire, Lichfield, South Lakeland) has been undertaken to ascertain if any of these local plans include objectives which might also be relevant to Derbyshire Dales. This suggests that the addition of an objective to enhance the sustainability of the District's principal settlements might be appropriate.

Suggested Amendments

2.19 Table 2 below shows suggested amendments to the previously agreed key issues and strategic objectives. Most of these amendments seek to address points made in the preceding sections of this report, a few merely incorporate minor changes to improve clarity or readability.

EXISTING KEY ISSUES (JUNE 2013)	SUGGESTED KEY ISSUES (NOVEMBER 2015)
PROTECTING PEAK DISTRICT CHARACTER	
1. Protecting and Enhancing the Character and Distinctiveness of the towns and villages in the Plan Area	<i>No change</i>
2. Managing the impact of development on the Peak District National Park	Managing the impact of development on the Peak District National Park and its setting and helping to relieve tourism and recreational pressure on the Park
3. Addressing the challenges of climate change	<i>No change</i>
SUPPORTING THE RURAL ECONOMY AND ENHANCING PROSPERITY	
4. Diversifying and Strengthening the Rural Economy	Strengthening the Rural Economy
5. Maintaining and Strengthening the Vitality and Viability of Town Centres	<i>No change</i>
6. Enhancing Tourism and Visitor Management	Enhancing the Value of the Visitor Economy
PROMOTING HEALTHY AND SUSTAINABLE COMMUNITIES	
7. Meeting Local Housing Needs	<i>No change</i>
8. Managing Travel Demand and Improving Accessibility	<i>No change</i>
9. Protecting and Enhancing Community Infrastructure and Local Services	Protecting and Enhancing Community Infrastructure, Connectivity and Local Services
10. Improving Leisure and Recreation Opportunities for Residents and Visitors	Protecting and Improving Leisure and Recreation Opportunities for Residents and Visitors

Table 2 - Suggested Modifications to Derbyshire Dales Local Plan Key Issues

2.20 Table 3 below sets out proposed revisions to the Strategic Objectives for inclusion in the emerging Derbyshire Dales Local Plan.

EXISTING OBJECTIVES (JUNE 2013)	SUGGESTED OBJECTIVES (NOVEMBER 2015)
PROTECTING PEAK DISTRICT CHARACTER	
SO1: To protect and enhance the Green Infrastructure Network	<i>No change</i>
SO2: To maintain, enhance and conserve the areas distinct landscape characteristics, biodiversity, and cultural and historic environment.	<i>No change</i>
SO3: To ensure that design of new development is of high quality and that it integrates effectively with its setting and promotes local distinctiveness.	SO3. To ensure that design of new development is of high quality, promotes local distinctiveness and integrates effectively with its setting.
SO4: To protect and enhance the character, appearance and setting of the towns and villages	SO4: To protect and enhance the character, appearance and setting of the District's towns and villages .
SO5: To address, mitigate and adapt to the effects of climate change on people, wildlife and places; promoting the prudent and sustainable use of natural resources.	SO5: To address, mitigate and adapt to the effects of climate change on people, wildlife and places..
SUPPORTING THE RURAL ECONOMY AND ENHANCING PROSPERITY	
SO6: To facilitate development that will support the continued growth and diversification of the local economy	<i>SO6: To facilitate development that will support the growth of the District's economy, particularly through improving the quality of local employment</i>
SO7: To support sustainable employment generating development in locations and of a scale appropriate to the plan area.	SO7: To support employment development in locations and of a scale appropriate to the plan area.
SO8: To support and promote the areas tourism and cultural sectors, and in particular the development of	SO8. To support and develop the District's tourism and cultural offer

EXISTING OBJECTIVES (JUNE 2013)	SUGGESTED OBJECTIVES (NOVEMBER 2015)
sustainable tourism initiatives.	
SO9: To strengthen the vitality and viability of the town centres as places for shopping, leisure and tourism.	SO9: To strengthen the vitality and viability of the District's market towns as places for employment, shopping, services, leisure and tourism.
PROMOTING HEALTHY AND SUSTAINABLE COMMUNITIES	
SO10: To facilitate the required housing growth for the plan area in sustainable and accessible locations.	<i>No change</i>
SO11: To ensure that there is an adequate mix of housing types, sizes and tenures to meet the needs of all sectors of the community.	<i>No change</i>
SO12: To protect existing, and support the delivery of new services, facilities and infrastructure.	SO12. To protect and facilitate the necessary infrastructure, connectivity, services and facilities to support the development of the District and connectivity
SO13: To support developments that minimise risks to health as a result of crime (or fear of crime), flooding, pollution and climate change.	SO13. To support developments that minimise risks to safety and health as a result of crime (or fear of crime), flooding, pollution and climate change of local residents, employees or visitors..
SO14: To increase opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling.	SO14. To encourage development that increases opportunities for healthy lifestyles.
SO15: To prioritise the efficient use of previously developed land and buildings whilst minimising the use of greenfield land.	SO15: To promote the efficient use of suitably located previously developed land and buildings whilst minimising the use of greenfield land.
	SO16: To facilitate low carbon development and energy generation from renewable sources, of a type, and scale. appropriate to its location

EXISTING OBJECTIVES (JUNE 2013)	SUGGESTED OBJECTIVES (NOVEMBER 2015)
	SO17. To increase the opportunities for travel using sustainable forms of transport by securing improvements to public transport, walking and cycling infrastructure.

Table 3 - Suggested Modifications to Derbyshire Dales Local Plan Strategic Objectives

KEY ISSUE

ARE THE PROPOSED MODIFICATIONS TO THE KEY ISSUES AND STRATEGIC OBJECTIVES APPROPRIATE FOR INCLUSION IN THE DERBYSHIRE DALES LOCAL PLAN ?

Any comments on the Key Issues and Strategic Objectives can be made online:

www.derbyshiredales.gov.uk/LocalPlan

3 ASSESSMENT OF HOUSING AND ECONOMIC DEVELOPMENT NEEDS

3.1 The NPPF indicates that robust evidence is required to support Local Plans and the policies within them. It sets out that Local Authorities should:

Prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- meets household and population projections, taking account of migration and demographic change;*
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
- caters for housing demand and the scale of housing supply necessary to meet this demand;*

3.2 The National Planning Practice Guidance advocates a wider approach to objectively assessed needs. It sets out that the assessment of housing and economic development needs includes the Strategic Housing Market Assessment requirement as set out in the National Planning Policy Framework. It also advises that the primary objective of identifying need is to:

- identify the future quantity of housing needed, including a breakdown by type, tenure and size;
- identify the future quantity of land or floorspace required for economic development uses including both the quantitative and qualitative needs for new development; and
- provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply

3.3 The Inspector in his report concluded that the approach taken by the District Council to setting its Objectively Assessed Need for Housing did not adequately take account of providing for affordable housing needs, and the economic aspirations for growth set out within the Derbyshire Dales Local Plan. Given the significant emphasis within the plan to adequately addressing the housing and economic needs of the area, it was considered appropriate to undertake a further review of the Housing and Economic Development Needs.

3.4 Consultants were appointed to provide advice on the following specific issues:

- a) The extent and nature of the housing market area within which Derbyshire Dales sits, and the extent to which the housing market extends into neighbouring local planning authority areas. In considering this requirement account must be taken of the advice in the NPPG about self-containment and the work undertaken by CURDS¹ and should take account of the 2011 Census Data on Travel-to-work.
- b) The extent to which the functional economic area in relation to economic uses for Derbyshire Dales covers the District Council area or otherwise.
- c) In accordance with the Advice in the NPPG the overall (objectively assessed) housing requirement for the housing market area and the District Council area for the period 2012-2031 and 2012-2033. In undertaking this element of the commission the appointed consultants are required to liaise with the consultants appointed by Sheffield City Region (David Simmonds and AECOM) to undertake an assessment of the potential spatial distribution the SEP ambition for 70,000 new jobs over the period 2015-2025, to ensure that the impact of these ambitions is taken into account appropriately. Similarly the appointed consultants should engage with D2N2 to seek views on the extent to which their SEP ambitions will influence the housing requirements for Derbyshire Dales.
- d) A breakdown of the overall housing figure by tenure, household type and household size for the period 2012- 2031 and 2012-2033
- e) An estimate of the future requirements for affordable housing for the period 2012- 2031 and 2012-2033
- f) Taking account of the Oxford Economics employment forecasts for Derbyshire, Experian retail expenditure data, the EKOSGEN report, the ambitions set out in the D2N2 SEP, Sheffield City Region SEP, the District Council's Economic Plan and future population forecasts, an assessment of the overall amount of land and floorspace required for economic development uses (including town centre uses) for the whole of the economic functional area, and the District Council area. The amount of land and floorspace required should be identified for the National Park area of Derbyshire Dales and the area for which the District

¹ <http://www.ncl.ac.uk/curds/research/defining/NHPAU.htm>

Council is the local planning authority for the period 2012 - 2031 and 2012-2033.²

- g) A breakdown of the overall figure for land and floorspace required for economic development uses (including town centre uses) by quality, type, size and location, based on a detailed assessment of current supply, vacancy rates, need and demand, making clear the amount of employment land required for new development, for the period 2012- 2031 and 2012-2033

3.5 The appointed consultants were also asked to ensure that the advice took account of evidence from the 2012-based population and household projections and the economic ambitions set out in the D2N2 Strategic Economic Plan, the Sheffield City Region Strategic Economic Plan, and the District Council's Economic Plan.

Housing Market Area and Functional Economic Area

3.6 A review of a wide range of indicators was undertaken to determine the extent to which the Housing Market Area (HMA) and Functional Economic Areas (FEMA) in Derbyshire Dales operate. The indicators included house prices, migration patterns, commuting patterns as well as retail and leisure provision, and transport infrastructure.

3.7 The report³ concluded that there are economic and housing market relationships between the north of the District and Sheffield; and the south of the District and Derby. The central part of the District is slightly more complex, with relationships between this area and a number of surrounding cities/larger towns – including Chesterfield.

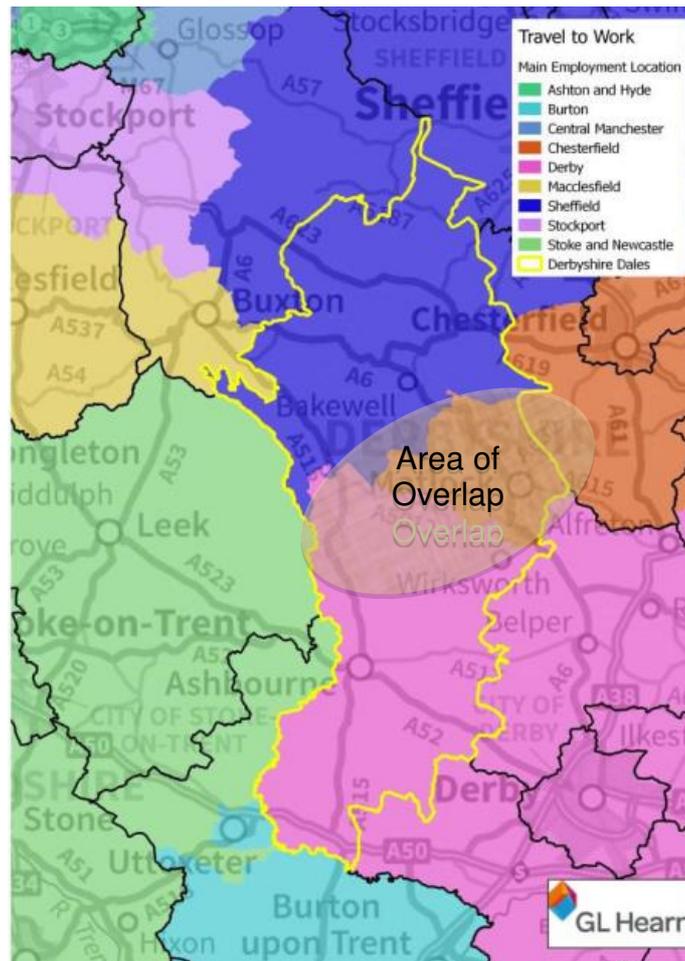
3.8 The consultants considered it appropriate to define the southern part of the District as falling within a Wider Derby-focused HMA / FEMA. This area includes Ashbourne and Wirksworth.

3.9 The report further recommended that the northern part of the District should be defined as falling within a Sheffield-focused HMA / FEMA. This includes Bakewell and Hathersage. There are localised inter-relationships between the north of the District and High Peak (particularly Buxton).

3.10 The central part of the District, including Matlock, is considered to fall within an “area of overlap” between Housing and Functional Economic Market Areas; with influences from Sheffield; from Chesterfield; and from Derby.

² Any assessment of requirement for the National Park area must be assessed in the light of the statutory purposes of national parks, the adopted development plan for the National Park and the specific policy references to National Park contained within the NPPF, as well as the anticipated different population change trajectories for Derbyshire Dales inside and outside the National Park.

³ http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local_Plan_Advisory/DDDC_HEDNA_Final_Report_18.09.2015.pdf



Objectively Assessed Need for Housing

3.11 The report makes it clear that by taking account of the guidance in the NPPF and the NPPG, and relevant case law precedents, the identification of the Objectively Assessed Need (OAN) for housing is a policy-off position. The OAN does not take account of any constraints to development within a particular area, which might influence what a local plan target may ultimately be.

3.12 The approach taken in the report follows the guidance in the NPPF and NPPG, both of which set out that the starting point for determining the OAN is the most recent population and household projections. In this case the 2012-Based Population and Household Projections.

3.13 The projections are however trend-based and the NPPG advises that in setting the OAN, consideration needs to be given to whether it is sustainable to plan on the basis of past trends, or whether wider evidence suggests that level of housing provision (in the absence of development constraints) should be adjusted to take account of:

- Employment trends
- Market signals

- Need for affordable housing

3.14 The NPPG sets out that employment trends should be considered to assess whether an alternative level or distribution of housing provision is necessary to support economic growth; or whether housing provision should be adjusted upwards to improve the affordability of market housing or enhance the delivery of affordable housing.

3.15 Throughout the report the consultants have sought to sensitivity test the data to ensure that the inputs into the OAN calculation for Derbyshire Dales are wholly appropriate for the area, including the 2012-Based Sub-National Population Projections.

3.16 The 2012-based Sub-National Population Projections (SNPP) indicates population growth of 8.4% in the District between 2013-33. This is modestly below that projected for Derbyshire as a whole (9.5%), but above recent rates of population growth.

3.17 The report indicates that when sensitivity checked, the 2012-based SNPP appear to be a sound demographic projection for Derbyshire Dales. Population growth sits above recent trends, but higher migration is projected moving forwards taking account of the likelihood that net migration to the District will increase as a result of age structure changes in the District; and growing populations in areas from which people typically move to the Derbyshire Dales. The wider evidence suggests that recent population growth has been constrained to some degree.

3.18 The 2012-based Household Projections, based on the SNPP, project a need for an average of 244 dwellings per annum over the 2013-33 period. This is based on past trends in births, deaths, age-specific trends in migration and household formation.

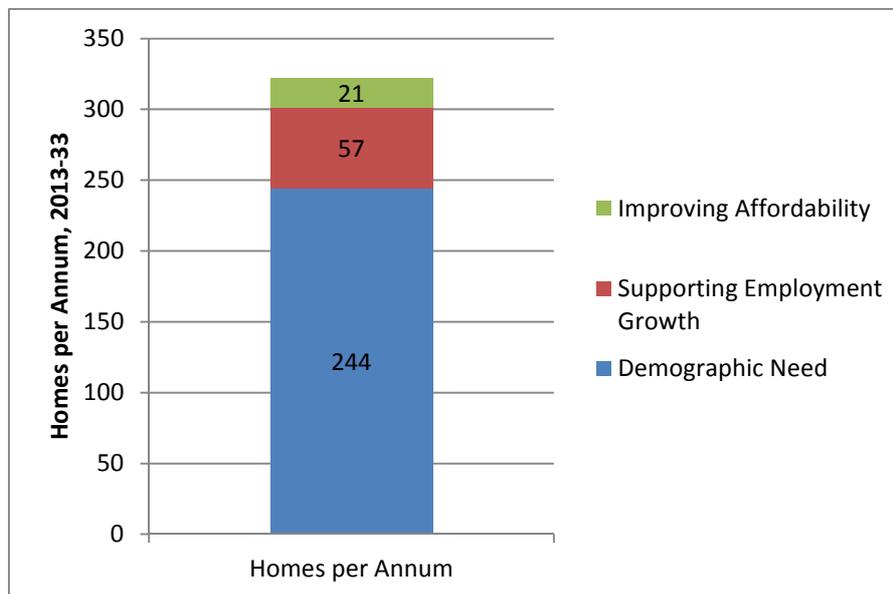
3.19 In order to consider the economic growth prospects for Derbyshire Dales a range of economic forecasts and other economic data was taken into account. The report concludes that on the basis of all of the available data, a reasonable evidence-based assessment of economic growth potential would be for employment growth of 1,700 jobs over the period 2013-2033. On the basis of this level of jobs growth it is considered that there would be a need for approximately 301 dwellings over the plan period to 2033 (244 demographic + 57 economic growth).

3.20 The final element in the OAN equation is the amount of housing required to meet future affordable housing needs. The assessment indicates that there is a need for 101 affordable houses per annum, and at this level it represents approx 41% of the overall demographic need, and 34% of the need derived from the economic-led projections. Following the approach in the PPG, the affordable housing needs evidence supports the case for a marginally higher level of housing provision than shown in the demographic-led projections. The higher housing provision in the economic-led projections will contribute to enhancing affordable housing delivery. Overall, there is case

to be made for an uplift on the overall housing requirement to address the affordable housing needs of the District.

3.21 The report also considers the extent to which house prices across the District influence the need to deliver more housing to meet housing needs. Comparatively high house prices contribute to affordability pressures. In this regard, affordability ratios in the Derbyshire Dales are high and are above national and county averages. Median house prices in the Derbyshire Dales are 8.6 times the median earnings in the District, compared to a national rate of 6.5 and a county rate of 5.5. The demographic data shows fewer younger people (in their 20s and 30s) living in the district suggesting that those priced out of the market are leaving or remain living outside of the district for longer. The evidence further suggests that housing costs would make it more difficult for younger people to live in the District.

3.22 Overall, the analysis clearly points to higher affordability pressures on housing in Derbyshire Dales than in other parts of the country, and higher prices and more acute affordability pressures than seen in neighbouring area. Taking account of the evidence, the report concludes that in order to improve affordability, an additional 21 homes per annum are required. Drawing this together, the report identifies an Objectively-Assessed Need (OAN) for housing for 322 homes per year (2013-33) across then whole of Derbyshire Dales (244 demographic + 57 economic growth + 21 affordable = 322) as illustrated below:



3.23 It is important to note that the OAN does not represent a policy target for housing provision. It needs to be brought together with other evidence regarding the capacity of the District to accommodate development. However it is an important starting point for considering how much housing provision to plan for.

Peak District National Park

3.24 Half of the District of Derbyshire Dales is included within the Peak District National Park Authority (PDNPA), as such the District Council is only Local Planning Authority for those parts of the district which lie outside the PDNPA.

3.25 Paragraph 14 of the NPPF sets out a presumption in favour of sustainable development whereby local plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or policies within the Framework indicate that development should be restricted. The footnote to Paragraph 14 clearly outlines that the Framework expects the designation of a National Park to restrict development and thus there is not an expectation that a National Park will seek to meet its objectively assessed housing needs in full. Instead, the policy focus is on meeting local needs with a specific focus on providing affordable housing within the Park; and working with local authorities to plan to meet housing needs across the wider Housing Market Area.

3.26 The report estimates that based upon the 2011 Census (population at output area level) that 35.9% of the District's population live within the National Park with 64.1% living outside the National Park. Using these proportions, the consultants have sought to calculate the need arising from within and outside the National Park. This is set out below:

	Homes per Annum	Within PDNP	Plan Area
Demographic Need	244	88	156
Supporting Employment Growth	57		57
Improving Affordability	21	8	13
Total	322	95	227

3.27 This is however only an estimate of the need within the Peak District National Park, and does not take account of the statutory purposes or the policy constraints that it operates within. The District Council will seek to work with the Peak District National Park Authority to establish the likely supply of new residential development over the period to 2033.

Alternative Housing Scenarios

3.28 The District Council has a requirement that the Derbyshire Dales Local Plan be subject to a Sustainability Appraisal which assesses the potential effects of a plan on the environmental, social and economic character of the area which the plan influences. As part of this process there is a requirement to consider reasonable alternative scenarios.

3.29 The consultants figure for Objectively Assessed Need for Housing for the period 2013-2033 has been tested alongside two other alternative housing scenarios⁴:

- Option 1: Meeting Affordable Housing Needs – 265 dwellings per annum (Total 5,300)
- Option 2 – Objectively Assessed Need for Housing – 322 dwellings per annum (Total 6,440)
- Option 3: Boosting the Derbyshire Dales Economy – 360 dwellings per annum (Total 7,200)

3.30 A high level sustainability appraisal assessment of these Options has been undertaken based on available information. The assessment has been able to identify the risks of adverse effects associated with each of the options. At this stage, the location of development is not known and therefore it has not been possible to identify any thresholds over which adverse effects or beneficial effects might occur or with regards to the capacity of the plan area to accommodate the levels of development proposed by the options. For example, when the SHLAA is completed, it will be possible to identify the sites which would be developed in order to deliver each level of growth. Should a highly sensitive site/s need to be developed in order to deliver a particular option, significant adverse effects would be identified in relation to that option.

3.31 Option 1 is the minimum amount of development to meet the future affordable housing needs (101 dwellings per annum) based upon 35% of new houses being affordable. This is slightly above the minimum demographic growth requirement but would not result in any employment growth for new jobs over the plan period. This scenario would have less environmental impact than providing for 6440 houses as less greenfield land would be required. Whilst it will ensure that there is an opportunity for more social facilities to be provided to meet residents needs it would not result in any uplift in the local economy as it does not result in any growth in the number of new jobs being provided in the local economy up to 2033

3.32 Option 2 would see both an uplift in the number of jobs created within Derbyshire Dales taking account of current forecasts. It provides the opportunity for some affordable housing to be provided to meet future needs. Improvement in social facilities would also result, though the environmental impact is greater than in Option 1.

3.33 Option 3 would see at this level of development enhanced economic growth for the area above that in Option 1 and Option 2 and would provide even more affordable housing as a result. Improvements in social facilities would also result from this option. However the environmental impact would be greater than either Option 1 or Option 2.

3.34 With regards to environmental effects, the assessment has only been able to identify that the risks of adverse effects increases from Option 1 to

⁴ In all three options the number of new homes across the District Council area would be higher than previous development rates, which have been no more than on average 200 per annum

Option 3, and, based on the precautionary principle, it is considered that the level of growth proposed in all three options poses risks of significant negative environmental effects occurring.

3.35 Without being able to evaluate the effects of each option 'on the ground' (i.e. without knowing where development will be located) it is difficult to identify an option which performs better than the other two. However, with regards to the level of social and economic benefits associated with each option, the assessment has identified that Option 1 could result in fewer beneficial social and economic effects than options 2 and 3.

3.36 When considering that Option 2 could represent lower risks of environmental effects compared with Option 3 but improved social and economic benefits when compared with Option 1, a simplistic view could be to consider Option 2 to potentially perform more positively than the other two options. However, due to the uncertainty about where development would be located, the environmental effects of development and what infrastructure / facilities developers would be expected to deliver, it is not clear in the assessment that this is the case.

3.37 Once the SHLAA is completed and it is clearer which sites will be needed to deliver each option, this assessment will be revisited and refined. The findings of the assessment will then be used to inform the choice of preferred option for the District-Wide Strategy.

Future Housing Types & Sizes

3.38 Paragraph 159 of the NPPF requires local planning authorities identify the range of types and sizes of accommodation likely to be needed by the population in future, including that required by those groups with specific housing needs.

3.39 There are a range of factors which will influence demand for different sizes of homes, including demographic changes, future growth in real earnings and households' ability to save; economic performance and housing affordability.

3.40 Taking account of the forecast changes in the size and structure of the population during the plan period, the report considers that the majority of demand for market housing will be for mid-market homes with 2 and 3 bedrooms. The evidence also points to a strong demand for bungalows from older households.

3.41 In terms of the mix of affordable and market homes, the report recommends the following provision over the plan period to 2033:

	1-bed	2-bed	3-bed	4+ bed
Market	5%	40%	50%	5%
Affordable	40%	35%	20%	5%
All dwellings	15%	40%	40%	5%

3.42 In terms of the different types of affordable homes the report identifies that 80% of the net need for affordable housing is for social and affordable rented homes, with 20% for equity-based intermediate housing options such as shared ownership homes. Intermediate housing includes:

- Help-to-Buy Shared Ownership
- Affordable Rent
- Rent-to-Homebuy
- Low Cost Sale

3.43 The population projections indicate that over the plan period the number of residents aged over 65 is expected to increase significantly, and as such is likely to require additional specialist housing provision. Based principally on the expected growth in population of older persons, the report estimates a need for an additional 1,182 specialist dwellings for older persons over the 2013-33 period (59 per annum). This need is principally for market housing, and forms part of the OAN identified above for 322 dwellings (being 18% of this).

3.44 The District Council will, in conjunction with other agencies need to give consideration as to how best to deliver this specialist need housing.

Employment Land and Floorspace Requirements

3.45 The report has also considered the need for employment land and floorspace in Derbyshire Dales taking account of economic trends and projected growth in employment, commercial property conditions and a survey of businesses across the District.

3.46 The evidence confirms that the economic appeal of the District is primarily from SME's and micro-businesses, and that there is generally a positive outlook with as significant number of businesses surveyed expecting business activity, turnover and staffing numbers to increase over the next five years.

3.47 Taking account of all the evidence the report provides forecasts for future employment space needs as follows:

Gross Need	Ha: Derbyshire Dales District
Net Demand	11.3
Allowance for Vacant Floorspace	1.1
Margin to Provide Choice and Flexibility	2.3
Total Gross Need	14.7

Future Retail Capacity

3.48 As part of the assessment of economic development needs the consultants have prepared an updated assessment of the quantitative capacity for retail floorspace within the District, and assessed the performance of town centres within the District.

3.49 The report⁵ is split into two sections, the first setting out a health check for the each of the main retail areas across the District:

- Ashbourne;
- Bakewell;
- Darley Dale;
- Hathersage;
- Matlock;
- Tideswell; and
- Wirksworth.

3.50 In general terms the report concludes that each of the main retail areas are generally healthy, well maintained, with low vacancy rates, and each retail centre fulfils its role as either a primary or secondary location well.

3.51 The second part of the report provides an updated quantitative assessment of retail floorspace capacity. It assesses the need for new retail floorspace by examining current shopping patterns and projecting potential turnover of these destinations in the future – taking account of expected trends in spending, as well as population growth.

3.52 To inform the retail assessment the consultants undertook a telephone household survey from 700 respondents who as a result provided up-to-date information on the patterns of expenditure and market share across the area.

3.53 The combination of the predicted growth in population levels and personal expenditure produces a growth in the pool of available expenditure in the survey area. It is estimated that available convenience expenditure will grow by 16.4% from £337.6 million in 2015 to £392.8 in 2033. This amounts to

5

http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local_Plan_Advisory/Derbyshire%20Dales%20Retail%20Study%20Final%20Report%20Sept%202015%20Reduced.pdf

a total increase in available convenience expenditure of £55.2 million over the plan.

3.54 Estimated comparison growth rates are higher than convenience rates and it is anticipated that the total pool of available comparison expenditure will grow by 87% between 2015 and 2033. There is currently £525.5 million of spend available in the survey area. This is expected to grow to £982.6 million by 2033 which is an increase of £457.1 million. Some of this additional spend will be absorbed by existing floorspace through efficiency gain, some will be absorbed by commitments and pipeline development projects, and the remainder will be available to support additional floorspace.

3.55 Combining the results of the household survey, and the expenditure data enables the calculation of turnover levels within each retail area to be derived, and from that the extent to which expenditure is retained within the District. The report indicates that only 33% of convenience expenditure is being retained within the Derbyshire Dales, with significant alternative draws from outside the area in Buxton, Chesterfield and Belper. In terms of comparison expenditure the report suggests that only 16% of comparison expenditure is actually retained within the Derbyshire Dales.

3.56 Whilst the result of the survey indicates low retention rates across the District Council area, the assessment of capacity for additional convenience floorspace across each of the settlements set out above does not show any potential scope for additional retail floorspace. In contrast the report suggests that by the end of the plan period there may be potential for up to 1,332 sqm of additional floorspace for comparison goods. However the report caveats this conclusion by indicating that it will be not be until approximately 2030 that there is any anticipated headroom for growth in retail capacity. In the interim, caution should be given to using these figures as a basis for future planning.

KEY ISSUES

A. WHAT LEVEL OF NEW HOUSING SHOULD THE DISTRICT COUNCIL ACCOMMODATE BETWEEN 2013-2033:

5,300 DWELLINGS

6,440 DWELLINGS OR

7,200 DWELLINGS

B. IS 15 HECTARES AN APPROPRIATE TARGET FOR NEW EMPLOYMENT LAND IN THE DISTRICT BETWEEN 2013 – 2033 ?

Any comments on the issues relating to the Assessment of Housing and Economic Needs including the Housing Market Area can be made online:

www.derbyshiredales.gov.uk/LocalPlan

4 STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

4.1 The National Planning Policy Framework (NPPF) indicates that the purpose of the planning system is to contribute to the achievement of sustainable development, including the delivery of a wide choice of high quality homes and to significantly boost the supply of housing. It advises that local planning authorities should have a clear understanding of the supply of land in their area.

4.2 Paragraph 159 of the NPPF requires local planning authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

4.3 The SHLAA should seek to identify a five years supply of deliverable sites against the housing requirement and also identify a supply of specific developable sites or broad locations for growth, for years 6-10 and, where possible for years 11-15 of the Local Plan.

4.4 The National Planning Practice Guidance (NPPG), which seeks to provide complementary guidance to the NPPF sets out that Housing and Economic Land Availability Assessments should:

- Identify sites and broad locations with potential for development
- Assess their development potential
- Assess their suitability for development and the likelihood of development coming forward

4.5 The District Councils current SHLAA was published in November 2013 and provided evidence to support the now withdrawn Derbyshire Dales Local Plan. Given the significant weight attached to the quantum of potential housing sites identified in the SHLAA by the Inspector in his report, it was considered that this evidence should be subject to a comprehensive review to determine more accurately the quantum of land for residential development available, and deliverable to meet the District Councils future housing needs.

4.6 The first stage in reviewing the SHLAA entailed issuing a 'Call for Sites'. This ran from 23rd October until 4th December 2014. The 'Call for Sites' provided an opportunity for local communities, Town and Parish Councils, landowners, residents and organisations to suggest land in Derbyshire Dales for future development. The 'Call for Sites' invited new sites to be submitted to the District Council for consideration for a range of land uses, including housing, Gypsy and Traveller accommodation, employment land, retail and leisure uses.

4.7 In order to ensure that the 'Call for Sites' consultation was inclusive, it was widely publicised, with advertisements placed in the Matlock Mercury, Ashbourne News Telegraph, Uttoxeter and Peak Advertiser, press releases issued and information made available on the District Councils website.

Relevant contacts from the Local Plan database were also notified by either letter or email. Those landowners, agents and developers who have previously promoted sites were asked to confirm whether their sites were still available.

4.8 Those nominating sites were required to complete a detailed site suggestion form which was made available on the District Councils website for completion either online or for submission by post or email.

4.9 A total of 206 sites were nominated to the District Council as a result of the 'Call for Sites' covering a wide range of land uses not just housing.

4.10 A methodology for assessing the sites has been prepared to reflect guidance contained within the NPPF and NPPG and to ensure the SHLAA represents a robust assessment of land availability. The appraisal of sites will seek to identify whether sites are deliverable or developable over the plan period to 2033. It will consider a number of factors, including flood risk, environmental constraints, landscape sensitivity, impact on the historic environment, topography, highways infrastructure and capacity, sustainability in terms of accessibility to services and facilities, infrastructure requirements and site viability, contamination issues and the character of the surrounding area.

4.11 To ensure that the sites are subject to a comprehensive assessment of their development potential the District Councils Landscape Officer, Design and Conservation Officer and Environmental Health Officer have provided advice on the sites suitability. Furthermore consultation with relevant bodies such as the Environment Agency, Highways Authority, Derbyshire Wildlife Trust and Derbyshire County Council's Archaeology team is being undertaken to ensure that the technical aspects of a sites suitability is taken into account

SITES THAT MAY BE SUITABLE FOR NEW RESIDENTIAL DEVELOPMENT CAN STILL BE SUGGESTED TO THE DISTRICT COUNCIL

THE ASSESSMENT OF THE SITES ALREADY PROPOSED TO THE DISTRICT COUNCIL IS STILL ONGOING.

AT THIS TIME IT IS ANTICIPATED THAT THE DRAFT VERSION OF THE SHLAA WILL BE AVAILABLE FOR IN JANUARY/FEBRUARY 2016.

THE SHLAA IS NOT PART OF THIS CONSULTATION

5 STRATEGIC LANDSCAPE SENSITIVITY ASSESSMENT

5.1 The strategy adopted in the withdrawn Derbyshire Dales Local Plan sought to continue previous strategies for the area of balancing the housing and economic needs of the area with the need to safeguard the areas high environmental quality.

5.2 However, the Inspector in his report concluded that on the basis of the evidence presented, he was not satisfied that the District Council had effectively demonstrated that the level of development proposed secured an appropriate balance between meeting development needs and safeguarding environmental quality.

5.3 Given the view taken by the Inspector it was considered appropriate to undertake a strategic landscape sensitivity analysis to assess the extent to which the landscape of the plan area is capable of accommodating new development.

5.4 In order to take this forward, landscape consultants were commissioned to undertake the following:

- A strategic landscape sensitivity⁶ analysis of areas in and around selected settlements across the local planning area.
- Landscape and visual impact assessments (LVIA)⁷ of sites that have been identified as being available for development.

5.5 The aims of the study are that the landscape sensitivity assessment should be capable of:

- Forming part of the evidence base which will underpin the Local Plan
- Providing a context for the allocation of sites for housing development
- Providing a sound basis on which decision making can be informed with regard to ongoing and future site assessment and the determination of potential planning applications, and;
- the LVIA should assist in determining the capacity of sites nominated through the Call for Sites to accommodate new development

5.6 The scope of the commission for the landscape sensitivity assessment was to identify different levels of sensitivity of the landscape to new development within and surrounding the following settlements:

⁶ Landscape sensitivity relates to the value attached to the landscape in terms of a wide range of factors including: its character; whether or not it is designated (as National Park or a Site of Special Scientific Interest or Local Wildlife Site for instance); whether it contains important features such as protected trees; its visual prominence; the nature of the local settlement pattern etc and its susceptibility to change brought about by development. In these terms landscape sensitivity can be assessed as being high, medium or low

⁷ LVIA is used to assess the impact that development is likely to have on a site in respect of the character and sensitivity of the landscape and the key features of it contained within the site and its surroundings and the impact on the visual amenity of those who live or work near the site or who travel through or past it. In these respects it can be used to assess the capacity of the site to successfully accommodate development.

- Matlock; Ashbourne; and Wirksworth;
- Darley Dale; Tansley; Hulland Ward; Brailsford; Doveridge Cromford; Matlock Bath; Middleton-by-Wirksworth;
- Northwood; Bonsall; Brassington; Clifton; Darley Bridge; Hognaston; Kirk Ireton; Kniveton; Marston Montgomery; Rowsley; Sudbury and
- Other locations at Two Dales; Upper Hackney; Bolehill; Carsington; Hopton; Bradbourne; Atlow; Mappleton; Hulland; Bradley; Yeldersley; Osmaston; Snelston; Wyaston; Norbury; Shirley; Ednaston; Rodsley; Yeaveley; Roston; Hollington; Alkmonton; Cubley; Longford; Boylestone; Somersal Herbert; Longcliffe

5.7 The scope of the commission for the LVIA was to assess the capacity of sites nominated through the 'Call for Sites' process taking account of the potential impact on landscape and visual amenity as well identifying, where appropriate, the type of mitigation measures which may be required in order that development can be successfully accommodated in and around the following settlements:

- Bonsall; Brassington; Clifton; Darley Bridge; Hognaston; Kirk Ireton; Kniveton; Marston Montgomery; Sudbury
- Yeldersley; Osmaston; Snelston; Wyaston; Shirley; Ednaston; Rodsley; Yeaveley; Roston; Alkmonton; Boylestone

5.8 These are settlements where the District Council's Landscape Design Officer had not previously undertaken site assessments but which may be subject to future development pressure.

5.9 In undertaking the assessment, the consultants emphasise the advice in the NPPF which sets out in Paragraph 109 that the *"planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes"*

5.10 The report⁸ also takes into consideration comments made by the Minister of State for Housing and Planning outlined in a letter dated 27th March 2015 which stressed that the impact of development on landscape character, particularly outside National Parks, can be an important material consideration in the determination of planning applications.

5.11 The methodology employed by the consultants to undertake the assessment draws upon the guidance set out within the Landscape Institute and the Institute of Environmental Management & Assessment "Guidelines for Landscape and Visual Impact Assessment" Third Edition (LVIA). In practical terms it also took into account work undertaken by the former Countryside Commission, and Derbyshire County Council on identifying the different landscape character types across Derbyshire Dales.

⁸

http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local_Plan_Advisory/Full%20Landscape%20Sensitivity%20Study%20Sept%202015%20-%20Reduced.pdf

5.12 The assessment process involved a combination of both desktop and field survey work, which categorised and assessed areas as either High, Medium or Low Sensitivity:

High sensitivity:

Land with a high susceptibility to change and/or which is of high value, e.g. land adjacent to or visually prominent from the PDNP or WHS, land outside of the settlement pattern, land which has high visual prominence, land which contributes to heritage or ecological assets.

Medium sensitivity

Land with a medium susceptibility to change and/or which is of medium value, e.g. land which has medium visual prominence, land which partially contributes to heritage or ecological assets.

Low sensitivity

Land with a low susceptibility to change and/or which is of low value, e.g. land within the settlement pattern, land with low visual prominence, land which has no or very limited contribution to heritage or ecological assets

5.13 The distribution of the high, medium and low sensitivity areas are shown on the Maps set out in the Appendix to the report⁹. The conclusions of the report are as follows:

“The northern half of the District is generally characterised by valley bottom settlements, both nucleated and linear in pattern. Settlements are larger in the north, with the Market Towns of Matlock and Wirksworth located here. Ashbourne is located near the centre of the District.

The density of settlements increases towards the north, with the collection of settlements located on the A6 around Matlock comprising the most densely developed area. In this area physical coalescence has occurred between many of the settlements, such as Matlock and Upper Hackney, and Darley Dale and Two Dales, and it is difficult to identify the delineation of settlements on a map. However visual coalescence is prevented due to the presence of extensive screening vegetation, and open space alongside the A6. Land which prevents visual coalescence is therefore of high sensitivity, and it is important that this land remains undeveloped in order to maintain the perceived breaks between settlements.

Land of high sensitivity in this area also relates to the proximity to the Peak District National Park. Many of the settlements, such as Rowsley and Northwood, are located on the opposite side of the Derwent Valley to the Peak District National Park. Therefore land surrounding them is visually prominent in views from the Park, and development could potentially adversely impact upon the setting of the Park.

⁹http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local_Plan_Advisory/Full%20Landscape%20Sensitivity%20Study%20Sept%202015%20-%20Reduced.pdf

The southern part of the District (south of Ashbourne) is generally characterised by nucleated settlements located on plateaus and ridges, which are generally more rural in character than in the north of the district. Settlements within the south are smaller and more dispersed, with the majority of the Small Villages and Other Locations concentrated in the south.

Areas of high sensitivity within the south predominantly related to visually prominent land which slopes down from the hilltop settlements, and land which contributes to the rural character of settlements. Sensitivity was also generally high in villages with heritage constraints, where the majority of the surrounding landscape was located within a Conservation Area, or was important for the setting of listed buildings.

Areas of low and medium sensitivity throughout the district were generally identified on land at a similar elevation to the adjacent settlement edge, which was enclosed or semi-enclosed with low visual prominence, and did not contribute to the character or setting of the settlement.”

Any comments on the Strategic Landscape Sensitivity Assessment can be made online:

www.derbyshiredales.gov.uk/LocalPlan

6 SETTLEMENT HIERARCHY

6.1 The National Planning Policy Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development and identifies three dimensions to sustainable development: economic, environmental and social. The location, scale and distribution of new development can have an impact upon social, economic and environmental well-being. It is important, therefore, that in meeting the development needs of the Derbyshire Dales, care is taken to ensure that the principles of sustainable development are being met.

6.2 The formulation of a settlement hierarchy is a commonly used policy tool, as it provides a useful basis for planning in a sustainable way. It seeks to guide development to those locations where local services and employment are available, whilst minimising environmental impacts and the need to travel.

6.3 The withdrawn Derbyshire Dales Local Plan included a settlement hierarchy, which categorised 22 settlements into three tiers; Market Towns, Larger Villages and Smaller Villages. However, the validity of this hierarchy needs to be reviewed to ensure it reflects the latest information about the availability of services, and to take account of economic and environmental factors in order to respond effectively to guidance in the National Planning Policy Framework.

6.4 An updated settlement assessment has therefore been undertaken which seeks to analyse settlements in the plan area in terms of their key economic, environmental and social characteristics¹⁰. Such factors are relevant to defining their function and ability to address the District Council's future development needs, particularly for housing development.

6.5 The resulting settlement hierarchy groups together those settlements that have broadly similar characteristics. At the top of the hierarchy are settlements that play a key role within the District, providing services used by a much wider catchment, having the best infrastructure (facilities and services) and which are relatively well connected in terms of transport links. At the bottom of the hierarchy are settlements, which have relatively few services and facilities, less infrastructure and are more isolated in terms of transport links.

Methodology and Main Findings

6.6 To ensure compliance with the NPPF, the Derbyshire Dales Local Plan should seek to guide development to the most sustainable settlements across the plan area. In general the most sustainable settlements have the greatest concentrations of shops, services, employment and leisure opportunities which are easily accessible to the greatest number of people, and tend to be the largest settlements.

¹⁰

http://www.derbyshiredales.gov.uk/images/documents/L/Local_Plan_Settlement_Hierarchy_Assessment_Final_Version.pdf

6.7 Within the plan area, the largest and most sustainable settlements are easy to identify. Consequently, no detailed assessment was undertaken of Ashbourne, Matlock and Wirksworth. A detailed assessment was however, been undertaken of:

- Settlements with a population of over 400;
- Settlements with a population below 400 where these support a primary school.

6.8 Settlements with a population less than 400 without a primary school, are not considered to provide a sustainable basis for accommodating major development (i.e. schemes of 10 dwellings or over), as analysis shows that service provision in such settlements is extremely limited. However, in some instances, small scale development may still be permitted within these settlements (subject to Local Plan policy compliance).

6.9 Whilst some settlements with less than 400 residents may support a public house and/ or a village hall, there are no settlements below this figure which support a convenience store except where special circumstances apply e.g. the National Trust presence in Sudbury.

6.10 The assessment considered the key economic, environmental and social factors in each of 23 settlements and included the following:

- Economic - the number of businesses or organisations providing employment within each settlement and the proximity of the settlement to employment centres and large employment sites;
- Environmental - the landscape sensitivity around each settlement i.e. the ability of the local landscape to accommodate change (an assessment itself based upon analysis of a wide variety of factors relating to flood zones, built and natural heritage designations, topography, landscape character, etc.) and the agricultural grade of surrounding land;
- Social - the frequency of public transport services, accessibility to the nearest town, as well as level of provision of community halls, convenience shops, public houses, GP Surgeries, post offices, pharmacies, and primary schools.

6.11 Each of the 23 settlements was given a score for its economic, environmental and social characteristics. The approach to scoring sought as far as possible, to avoid subjective weighting assumptions and applied a system of scoring which gave equal weight to economic, social and environmental considerations with the theoretical potential maximum score of 20 points per factor. The total score achieved for each settlement is indicative of its level of sustainability and provides the general basis for the grouping of settlements under the headings of Market Towns, Urban Areas, Larger Villages, Smaller villages and Other Villages.

6.12 The scores for each settlement have been added up and are shown in the Table 4 below. As a brief guide:

- A high score on the economic factor reflects a settlement which has a reasonable number of businesses providing employment within the settlement and a short drive time to employment centres or large employment sites. A low score on the economic factor reflects a settlement with few local businesses and longer drive times to employment centres or large employment sites;
- A high score on the environment factor reflects a settlement which has a relatively low surrounding landscape sensitivity and therefore greater capacity to accommodate development and which is surrounded by relatively poor grade agricultural land. A low score on the environment factor reflects a settlement which has relatively high landscape sensitivity and therefore less capacity to accommodate development and which is surrounded by a relatively good grade agricultural land;
- A high score on the social factor reflects a settlement with good public transport services, spare capacity in its primary school or schools, and a good range of facilities such as convenience shop, doctor's surgery, post office, community hall, etc. A low score on social factors reflects a settlement with few facilities, no recent capacity in the primary school and poor public transport services.

SETTLEMENT	ECONOMY SCORE	ENVIRONMENT SCORE	SOCIAL SCORE	OVERALL SCORE
Darley Dale	18	5	19	42
Cromford	12	4	16	32
Rowsley	11	5	15	31
Matlock Bath	14	4	13	31
Tansley	10	8	10	28
Doveridge	4	9	13	26
Sudbury	8	1	17	26
Brailsford	4	5	13	22
Northwood	12	6	4	22
Middleton	3	6	12	21
Darley Bridge	6	4	10	20
Clifton	6	5	9	20
Kniveton	2	9	7	18
Hulland Ward	2	4	12	18
Bonsall	2	5	10	17
Brassington	3	4	8	15
Marston Montgomery	1	5	8	14
Roston	1	8	5	14
Carsington	1	5	7	13

SETTLEMENT	ECONOMY SCORE	ENVIRONMENT SCORE	SOCIAL SCORE	OVERALL SCORE
Bradley	3	4	5	12
Osmaston	3	1	7	11
Kirk Ireton	0	4	7	11
Longford	0	5	2	7

Table 4 - Settlement Assessment Scoring Matrix

6.13 The Settlement Assessment goes onto propose a settlement hierarchy with 5 tiers as follows:

TIER	SETTLEMENT
Tier One : Market Towns	Ashbourne Matlock Wirksworth
Tier Two : Urban Area	Darley Dale
Tier Three : typically larger villages with reasonable accessibility to services and facilities	Brailsford Cromford Doveridge Matlock Bath Middleton Northwood Rowsley Sudbury Tansley
Tier Four : typically smaller villages with less accessibility to services and facilities	Bonsall Brassington Clifton Darley Bridge Hulland Ward Kniveton
Tier Five : typically small villages with very limited access to services and facilities	Bradley Carsington Kirk Ireton Longford Marston Montgomery Osmaston Roston

Table 5 - Settlement Hierarchy

6.14 In line with the overall aim of planning to contribute towards the achievement of sustainable development, the strategy in the new local plan should, where appropriate, seek to guide the majority of new development to

higher tiered settlements. This may be achieved by trying to facilitate higher growth rates in each successive tier, so that the lowest growth rates occur in Tier 5 and the highest growth rates in Tier 1.

6.15 Given the same opportunities for development, it should be normally expected that each settlement in a higher tier will be allocated more development in the new local plan than settlements in lower tiers.

6.16 The settlement assessment has, however, not sought to take into account the availability, suitability or deliverability of land throughout the plan area since this is not the primary purpose of the assessment. As such, it may not be possible or even desirable, to seek to accommodate all of the district's future land housing requirements in higher tier settlements alone, particularly where sites may not be available or where they are severely constrained when compared with opportunities elsewhere.

KEY ISSUE

A. ARE THE 26 TOWNS AND VILLAGES LISTED ABOVE THE MOST APPROPRIATE LOCATIONS FOR SITES TO BE ALLOCATED IN THE DERBYSHIRE DALES LOCAL PLAN. ?

B. IS SMALL SCALE INFILL AND CONSOLIDATION IN THE VILLAGES NOT LISTED ABOVE AN APPROPRIATE STRATEGY TO ADOPT ?

C. ARE THERE ANY OTHER WAYS THE DISTRICT COUNCIL COULD MAINTAIN THE SUSTAINABILITY OF THE SMALLER VILLAGES OTHER THAN THROUGH NEW DEVELOPMENT ?

Any other comments on the Settlement Hierarchy can be made online:

www.derbyshiredales.gov.uk/LocalPlan

7 REVIEW OF INFRASTRUCTURE NEEDS AND PLAN VIABILITY (INCLUDING COMMUNITY INFRASTRUCTURE LEVY)

7.1 Advice set out in the NPPF and the Planning Practice Guidance make it clear that the provision of infrastructure through the planning system is one of the key economic drivers required for delivering sustainable development. Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of NPPF.

7.2 Local planning authorities are advised that they should work with other authorities and providers to: assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

7.3 In order to take forward the preparation of the Derbyshire Dales Local Plan it was considered necessary to undertake an assessment to identify gaps in the existing infrastructure provision across the plan area, and to identify the infrastructure requirements necessary to support the sustainable growth of the plan area.

7.4 The NPPF advises that in pursuing sustainable development careful attention needs to be given to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

7.5 As such, it is incumbent upon the District Council to demonstrate the deliverability of all aspects of the Derbyshire Dales Local Plan. Given this advice, sites brought forward through the Local Plan should be capable of being deliverable and developable. As such it was considered appropriate that some viability testing of sites coming forward through the SHLAA process should be undertaken. It was also considered appropriate to test the potential impact that emerging policies in the Local Plan may have on the deliverability of the plan as a whole.

7.6 The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. Development may be liable for a charge under the Community Infrastructure Levy (CIL), if the local planning authority has chosen to set a charge in its area.

7.7 The District Council is a charging authority within the legislation and as such, should set a rate which does not threaten the ability to develop viably the sites and scale of development identified in the Local Plan. The NPPG sets out that local authorities will need to draw on the infrastructure planning evidence that underpins the development strategy for their area. Charging authorities should use that evidence to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact upon the economic viability of development across their area.

7.8 The NPPF sets out that where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan. The Community Infrastructure Levy should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place.

7.9 Although some initial unpublished research has previously been undertaken on the potential for the introduction of CIL across the Peak Sub Region, this is now out of date and it was considered appropriate to reconsider this in light of the current work on the review of the Local Plan.

7.10 Consultants were therefore appointed to undertake the following;

- an assessment of the current situation with regards to infrastructure provision across the plan area
- the potential need for new infrastructure provision to meet growth scenarios across the plan area
- to provide advice on the viability of sites suggested for inclusion within the latest version of the Strategic Housing Land Availability Assessment.
- to undertake an assessment on the potential feasibility of introducing the Community Infrastructure Levy on new development across the local plan area
- to act as retained consultants to undertake a whole plan viability assessment and provide advice on deliverable levels of affordable housing, and other development needs

7.11 The initial stage of the infrastructure needs assessment was to establish contact with a wide range of infrastructure and service providers to determine the extent to which previous infrastructure plans remained up to date, and to identify areas which required some further development work. To achieve this each of the providers was sent a pro-forma, in which relevant extracts from previous infrastructure plans were included. Providers were asked to review and provide comment on the information previously given. They were also asked about infrastructure availability and capacity issues and the extent to which they would be key considerations for the new Local Plan, and to highlight key planned investments and improvements.

7.12 A workshop was held with key stakeholders in June 2015, the purpose of which was to enable attendees to discuss the emerging Local Plan and ‘join up’ any issues raised by the different infrastructure providers that could be addressed in the context of the preparation of the Derbyshire Dales Local Plan.

7.13 The overall conclusion in the report¹¹ is that in general terms, there are few matters of serious immediate concern for the District.

7.14 The report identified that local transport issues in the main town centres of Matlock, Ashbourne and Wirksworth will still need to be addressed. It suggested that this is particularly critical in Ashbourne, where the cumulative impact of the any potential development sites could add to existing congestion issues. It also suggests that in order to confirm (or otherwise) the need of a bypass for Ashbourne, more detailed analysis is required to establish the costs and benefits of such a scheme.¹²

7.15 The report concludes that the anticipated future growth is unlikely to require any significant enhancements in national supply infrastructure for the main utilities of electricity, gas and water, nor the principal emergency services.

7.16 In regard to health services, the report identifies that a dispersed approach to development is likely to place pressure on primary care services, as a critical mass is needed to support new or expanded health practices. It is therefore suggested that a more concentrated pattern of development would assist in bringing forward new healthcare facilities. Both of the Clinical Commissioning Groups that cover the Derbyshire Dales District anticipate having a plan of future facilities needs developed later in 2015. Discussions are currently on-going with the NHS Clinical Commissioning Groups to address priorities for action in light of the likely extent of evidence emerging from the Housing and Economic Development Needs Assessment.

7.17 In terms of education needs, Derbyshire County Council have developed a robust methodology for quantifying the impact of additional housing development upon schools in the Derbyshire Dales and regular liaison is maintained between the District Council and the County Education Authority in this regard. The evidence indicates that improvements to primary and secondary provision in Ashbourne, as well as primary provision in Wirksworth are likely to be key issues that will need to be addressed in taking forward the Local Plan.

7.18 The report also indicates that continued investment in broadband through the Digital Derbyshire project will help ensure that future residents and businesses have access to sustainable communications infrastructure.

¹¹ http://www.derbyshiredales.gov.uk/images/documents/L/Local_Plan_-_Derbyshire_Dales_IDP_Review_Report_v1.0_210915.pdf

¹² A subsequent study of the potential traffic and transportation implications of the potential sites identified within the Call for Sites has recently been commissions and will report in January/February 2015.

7.19 In terms of the provision of community facilities such as libraries and sports facilities, the report indicates that these are likely to remain under pressure as a result of the Government's ongoing austerity measures. Whilst such facilities are essential to enhancing the quality of life for both new and existing residents, additional funding is likely to be required in order to maintain and provide new facilities. However, this is likely to be needed outside the Local Plan process. The report concludes such matters are not a significant constraint on growth.

Viability and Community Infrastructure Levy

7.20 The need for viability assessments derives from the guidance in the NPPF that Local Plans need to be deliverable, and from the CIL Regulations which indicate that in considering the introduction of CIL, it should not have an adverse impact upon the delivery of development.

7.21 The evidence from the Infrastructure Report suggests that at the present time, there is a justifiable aggregate funding gap of around £22million for infrastructure that could be legitimately funded through CIL.

7.22 The approach to testing viability used by the consultants was to undertake an area based approach, based upon three value areas, which in turn were determined by house prices derived from the Land Registry. This approach involves the following key steps:

- Determination of residential value areas, development schemes and viability assumptions.
- A residual appraisal is then carried out subtracting all anticipated development costs from the scheme's Gross/Net Development Value to arrive at a residual site value for each development scheme. The appraisal includes provision for affordable housing and S106 obligations as an input.
- The residual site value for each development scheme is then benchmarked against a site value threshold (the price at which it is considered a landowner may actually sell) to determine the 'headroom' available for CIL/other planning requirements.

7.23 As part of the viability assessment process, consultation was undertaken with a range of developers, housebuilders, housing associations and property/planning agents. This included a facilitated workshop held in May 2015 where the assumptions about values, and development costs were discussed and generally agreed for a range of development types, including housing, retail office and industrial development.

7.24 Viability assessments were undertaken for a range of residential site sizes and by the different value areas, as well as for retail and other commercial development. For each assessment, an assumption was made about the impact that the policy requirements set out in the now withdrawn Derbyshire Dales Local Plan would have on the various types of development

e.g. £1000 per/sqm was included as an allowance for site specific S106 requirements (such as site specific highways requirements for new developments)

7.25 The evidence in the report¹³ indicates the diversity of development viability across Derbyshire Dales. Residential and retail are the only development typologies considered to be generally capable of bearing CIL at the current time.

7.26 The viability of CIL on residential development is limited to high and mid value areas of the District when a policy of 33% and 45% affordable housing contributions is applied. However, at 30% affordable housing provision, there is considered to be potential for CIL within all areas of the District albeit at a relatively nominal level in the lower value area. Reducing the affordable housing requirements to 20% would dramatically increase the level of CIL that is viable, therefore the balance of need and priority between infrastructure funding and affordable housing is an important consideration for the Council. The report recommends that the policy requirement for the provision of affordable housing should be reduced to 30% as this is considered to be the maximum level that can be supported in order to maintain a reasonable headroom for the provision and introduction of the CIL.

7.27 The viability to charge CIL on commercial development is limited. Some types of retail development are able to bear a CIL charge, with retail warehousing and certain formats of supermarket indicated to have headroom – although this varies in terms of the location of the development with only town centre and out of centre locations being able to support CIL.

7.28 The care home typology tested demonstrates the capacity for up to £20 psm (the reason there is less headroom in the mid and lower value areas is because of the variant land value benchmark in the different value areas). All other commercial development typologies have no headroom for CIL in current market conditions.

7.29 Taking all these factors into account the report outlines a potential CIL charging scenario which is set out below for Members information

Development Type & Locations	Maximum CIL Headroom	Potential CIL Charge
Residential at 45% AH	£ per sq m	£ per sq m
Value Area High	£150	£75
Value Area Medium	£20	£10
Value Area Lower	£0	£0
Residential at 30% AH		
Value Area High	£250	£125
Value Area Medium	£150	£75
Value Area Lower	£20	£10

¹³ http://www.derbyshiredales.gov.uk/images/documents/L/Local_Plan_-_Derbyshire_Dales_District_Council_Viability_Report_September_2015.pdf

Development Type & Locations	Maximum CIL Headroom	Potential CIL Charge
Residential at 20% AH		
Value Area High	£300	£150
Value Area Medium	£200	£100
Value Area Lower	£75	£40
Retail		
Town Centre		
Shopping Centre	£0	£0
Retail Warehousing	£100	£50
Superstore	£349	£175
Supermarket	£0	
Convenience Store	£247	£125
Local Centre		
Convenience Store	£0	£0
Villages		
Convenience store	£0	£0
Out of Centre		
Retail Warehousing	£100	£50
Superstore	£349	£175
Supermarket	£0	£0
Convenience Store	£0	£0
Care homes	£20	£10
All other commercial uses	£0	£0

KEY ISSUE

SHOULD THE LOCAL PLAN INCLUDE A STRATEGY THAT REDUCES FROM 45% TO 30% THE PROPORTION OF AFFORDABLE HOUSING REQUIRED ON ALL NEW HOUSING DEVELOPMENTS TO ENABLE MORE INFRASTRUCTURE TO BE PROVIDED ?

Any other comments on the Infrastructure, Viability & the Community Infrastructure Levy Assessment can be made online:

www.derbyshiredales.gov.uk/LocalPlan

8 GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT

8.1 The National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS) require local planning authorities (LPAs) to carry out assessments of the future accommodation needs of Gypsies and Travellers. These are called Gypsy and Traveller Accommodation Assessments (GTAA's), which can be used to inform the preparation of policy and site allocations for Gypsies and Travellers at Housing Market Area (HMA) or Local Plan level, as appropriate.

8.2 In accordance with the NPPF and the Duty to Co-operate set out in the Localism Act 2011, a GTAA covering Derbyshire and East Staffordshire was jointly commissioned in August 2013 by the following partners to update the previous study published in 2008 for Derbyshire and 2013 for East Staffordshire:

- D10 - including the Derbyshire County Council, Derby City Council and the eight District and Borough Councils in Derbyshire;
- The Peak District National Park Authority;
- East Staffordshire Borough Council; and
- The Derbyshire Gypsy Liaison Group.

8.3 The final version of the GTAA 2014 has been published by Derbyshire County Council on their website along with a Position Statement which sets out the status of the study.¹⁴

8.4 The GTAA represents a piece of evidence which provides a starting point for considering pitch and plot requirements for Gypsies and Travellers and Travelling Showpeople in the study area for the period 2014/15 to 2033/34.

8.5 The data for the study was obtained from three main sources:

- **Primary data:** face-to-face surveys of Gypsies and Travellers
- **Secondary information:** including a literature review and secondary data analysis
- **Stakeholder consultation:** with local organisations involved with Gypsies and Travellers and Travelling Showpeople

8.6 The accommodation need was assessed using a Department for Communities and Local Government model in accordance with the advice set out in the NPPG. The model contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group of Gypsies and Travellers, based on primary data.

¹⁴

http://www.derbyshire.gov.uk/environment/land_premises/traveller_sites/gypsy_and_traveller_accommodation_assessment/default.asp

8.7 Overall the total requirement for new accommodation across the whole of the study area over the next 20 years is:

- 134 residential pitches
- 4 transit sites/emergency stopping places consisting of at least four or five pitches
- 13 Travelling Showpeople plots.

8.8 In respect of the requirement for accommodation within the Derbyshire Dales, the study indicates that over the next five years provision should be made for 6 pitches and in the future 1 additional pitch every five years for the next fifteen years, equating to a total requirement of 9 pitches to be found over the next 20 years.

8.9 The report sets out that need does not have to be met where it arises i.e. it could be met throughout the study area local authorities. This is particularly in relation to meeting needs arising from families residing on unauthorised encampments requiring permanent accommodation.

8.10 As such, the GTAA recommends that the study area local authorities adopt HMA-type collaborative structures to help determine how to jointly meet the accommodation needs of Gypsies and Travellers. The report in its conclusions makes the following points:

- According to the survey undertaken with Gypsies and Travellers in the study area the preferred size for permanent/residential sites is for small, family sized sites. The stakeholder meetings undertaken as part of the GTAA confirmed that smaller sites are preferred.
- Following CLG (2008) guidance it is recommended that new sites contain a maximum of 15 pitches whilst smaller sites for individual extended families should be considered.
- Survey results suggest that a mix of public and private sites will be required dependent on need. Specific sites available should be outlined in future DPDs and guidance offered on the type of land that is likely to obtain planning permission as well as land that is unlikely to. Specific advice on the planning process should also be offered.
- Local authorities should consider how they can facilitate the provision of new sites including applying for funding as part of the HCA's 2015-18 Affordable Homes Programme (AHP); sites developed on a cooperative basis; shared ownership; small sites owned by a local authority, but rented to an extended Gypsy or Traveller family for their own use; and Community Land Trust options.
- Local authorities should jointly (within the HMA-type groupings) examine their Strategic Housing Land Availability Assessments (SHLAAs) as well as other land availability documents to identify suitable locations.

- Gypsies and Travellers living in bricks and mortar accommodation sometimes face discrimination and hostility from the settled community. Local authorities should consider the provision of alternative accommodation which directly meet the needs Gypsies and Travellers such as group housing schemes.

KEY ISSUES

A. ARE THERE ANY SITES WITHIN DERBYSHIRE DALES THAT COULD BE IDENTIFIED AS BEING SUITABLE TO MEET THE FUTURE NEEDS OF THE GYPSY AND TRAVELLER COMMUNITY ?

B. TO MEET THE FUTURE NEEDS SHOULD THE DISTRICT COUNCIL IDENTIFY A SINGLE SITE CONTIANING THE REQUIRED NUMBER OF PITCHES; A NUMBER OF SITES OR SHOULD SITES BE DISTRIBUTED MORE EVENLY ACROSS THE PLAN AREA ?

Any other comments on the Gypsy and Travellers Accommodation Assessment can be made online:

www.derbyshiredales.gov.uk/LocalPlan