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# MATLOCK CIVIC ASSOCIATION

Secretary : Ken Parker, :

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## Statement for consideration at Local Plan Inquiry 16 May 2017 - Ref 5323

In our representations dated 21 September 2016 we summarised the comments we had made at the various stages of Local Plan preparation. In this Statement we are summarising the key points we have made in relation to housing sites in Matlock. These points can be elaborated on 16 May 2017. The Inspector's summary of issues relate to three sites but our representations relate to some fundamental issues too.

**1. The scale of housing proposed seems out of proportion** to what can reasonably be expected to be needed, built and occupied in and around Matlock during the Local Plan period up to 2033 (only 16 years away). There are many planning permissions which have yet to be developed or where development has only recently started. We recognise the proposed number of houses is based on national guidelines but the rate and scale of development implied is more than anything that has ever been achieved in Matlock over comparable timescales.

Already there are at least nine major housing sites with planning permission in and around the town where development has not yet taken place (or where work has only recently started). There are also several smaller sites where development has been accepted (eg Megdale and Hackney Lane). In addition there are several other existing consents in Tansley and Darley Dale which are very close to Matlock.

These nine large sites in or immediately adjacent to Matlock are:

- a) Chesterfield Road south of the Golf Course. Perimeter fencing has recently been erected.
- b) Chesterfield Road north of Bentley Brook. Site works have recently commenced.
- c) Extension to Moorcroft, off Chesterfield Road. The first houses are under construction.
- d) Asker Lane fields. Outline consent granted on appeal. Detailed application under consideration.
- e) Tansley Wood Mills. A large brownfield site with consent. Site clearance started many years ago but work stopped and has yet to resume.
- f) Cawdor Quarry. A large brownfield site with existing consent where a new application is currently under consideration (see 5 below).
- g) Halldale Quarry. A large brownfield site above Cawdor Quarry with consent. See 4 below.
- h) Bakewell Road opposite Whitworth Hospital. A greenfield site with a recent consent.
- i) Harvey Dale Quarry. A brownfield site close to the Town Centre.

In total these sites with existing consents must provide a total of about 1,000 new dwellings. There are currently about 3,000 dwellings in Matlock. To add 30% extra houses to our town in just 16 years seems unlikely to be realistic, achievable or desirable. We think it unlikely that all these consents will actually be developed by 2033.

We believe it is unwise to allocate yet more sites for three main reasons.

- a) There is considerable uncertainty on what the effects of Brexit will be. Population growth could be affected. The economic consequences are uncertain and could affect the ability of would-be purchasers to buy houses.
- b) We fear that allocating yet more land for development could result in several half-built sites scattered around the town. Far better to phase the release of land so that new allocations relate to actual rates of construction.
- c) Housing and Employment provision need to be in balance or Matlock could just become a commuter town (even more than it already is). This is not 'Sustainable Development'.

If the Inspector has to comply with set numbers, however unrealistic they may be, it would make sense to adopt a phasing policy with no new sites to be allocated until existing permitted sites and brownfield sites are brought into use.

**2. The priority should be to focus development on brownfield sites.** The National Planning Policy Framework (NPPF) sets out twelve core land-use planning principles at para 17. The eighth of these is that the planning system should "...encourage the effective use of land by re-using land that has previously been developed (brownfield land)..." This statement is effectively repeated at para 111 which also states "... Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land". The Local Plan needs to reflect the NPPF.

There are considerable areas of brownfield sites in and around Matlock, many of which already have planning permission and/or are within the settlement boundary. Four of the largest brownfield sites with existing

consents are identified at point 1 above. For as long as new greenfield sites continue to be allocated then brownfield sites, which tend to be more expensive to develop, will remain undeveloped and continue to be a blight on our town. To accept this situation is not consistent with the Sustainable Development principles that underly the NPPF.

Taking these two points into consideration our response to the three sites that the Inspector identifies for discussion is as follows:

### **3. Gritstone Road.**

- a) This is the only greenfield site to be discussed on 16 May. It should not be allocated for housing for reasons explained at 1 and 2 above.
- b) If the brownfield sites are in fact developed and there is a demonstrable need for further housing then the Gritstone Road site could be brought forward for consideration towards the end of the Local Plan period.
- c) We have already made detailed comments to the would-be developers in response to their 2016 consultation (letter dated 27 October 2016, ref MCA1065A).

### **4. Halldale Quarry.**

- a) This is a brownfield site but much of the southern half of the former quarry has been assimilated back into the landscape. This southern half of the quarry is very prominent in views from across the valley. Therefore it is only the northern half of the quarry floor, closest to the town, which is suitable for development.
- b) We support the new use of this northern part of the site for a sensitively designed development focused on employment uses. Housing is better accommodated in Cawdor Quarry which is lower lying and better related to the rest of the town.
- c) Because of its close relationship to Matlock Spa Road and the unsuitability of Snitterton Road for additional traffic, measures need to be taken to ensure virtually all traffic uses Matlock Spa Road.

### **5 Cawdor Quarry.**

- a) This is a brownfield site well related to the rest of Matlock. In principle we support its allocation for development, mainly for housing.
- b) Pedestrian and cycling links to the town and to the surrounding areas need to be improved - in particular by providing a new bridge linking to the end of the new cycle-trail opposite the Arc Leisure Centre.
- b) The prospective developers have argued that additional greenfield land (Snitterton Fields) needs to be allocated for development in order to make the project financially viable. However no detailed Financial Viability Statement has been produced by the developer. We oppose the allocation of Snitterton Fields.
- c) We have made detailed representations on the Outline Planning Application currently under consideration on a considerable number of points - eg open space management, access to schools (letter dated 7 March 2017 ref MCA1084B). On the Snitterton Fields issue we made the following points:
  - The historic costs incurred on the relief road and other aspects of the scheme implemented as part of the Sainsbury's Scheme are of limited relevance. They will have been offset by the contributions made by Sainsbury's. The financial arrangements made between the developers and Sainsbury's are not explained.
  - The developers have invited specialist contractors to estimate the costs of the remediation work necessary. The figures range between £5 and 8 million. This is £10,000 to £15,000 per dwelling based on excluding the Snitterton Fields element - not a particularly high figure.
  - The development at Limestone Croft was justified on the basis that the profits would be used to contribute to the remediation work in Cawdor. There seems to be no information on this in the current application.
  - The earlier planning permission for Cawdor had a much lower allocation for affordable housing as an exception to DDDC policy accepted on the basis that the costs of remediation would need to be offset by a higher proportion of open market housing. So the costs of remediation are already accounted for.
  - The purchase price of the land would have reflected the contamination and disturbance caused by quarrying and the various industrial uses of the site. It would have been far less than a prime greenfield site and any developer would have factored in costs of remediation as part of the purchase negotiation.

**6. Conclusion.** No new greenfield sites should be allocated for housing in the Matlock area. The District Council's proposed allocation of Gritstone Road should be rejected (see 3 above) and the developers proposed allocation of Sitterton Fields should be rejected too (see 5 above).

Ken Parker  
Secretary to the Association  
13 April 2017

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