



Acres Land & Planning Ltd

'Acres of space'

Client: The Goodall Family
Matters 10 & 11; Rural Areas Settlement Policy
Session 14: Allocations and Settlement Boundaries Rural Parishes

FURTHER SUBMISSION ON ALLOCATIONS & SETTLEMENT BOUNDARIES: RURAL PARISHES.

DERBYSHIRE DALES LOCAL PLAN: EXAMINATION IN PUBLIC

Introduction.

Acres Land & Planning Ltd (ALPS) have submitted representations on behalf of the Goodall Family in support of their land at Brailsford which is proposed for future housing development. This further submission summarises the key points raised by ALPS in our cases and addresses the points raised by the inspector in his Question & Answer paper.

Issue 1. The Development Strategy.

Are the allocations in the Villages (3rd Tier) consistent with the development strategy (Policy S10)? Is the extent of growth proposed in the villages of Brailsford, Doveridge, Hulland Ward and Tansley sustainable having particular regard to the availability of services and employment?

A key feature of the Local Plan which we detect is that the housing allocations are implicitly 'supply-led' rather than necessarily 'demand led' – or in other words are located where the sites can be found rather than necessarily where people wish to be. This would appear to be a consequence of the Council's 2 stage 'Site Search' methodology which has tended to follow the 'Call for Sites' and the outcome of the Strategic Housing Land Availability Study (SHLAA), linked to the Council's criteria for allocation which focus in particular on using brownfield sites (which in the Dales tends to mean disused quarries or Ashbourne Airfield) as well as applying other policy constraints in a fairly mechanical way.

Policy HC2, identifies a total of 3515 dwellings on 28 sites. Over 30% of this figure is focused on one site at Ashbourne Airfield (for 1100 dwellings), albeit not all of the site is programmed to come forward within the Plan period. A further 1015 dwellings, or 29%, is focused on four large quarry sites in Matlock, Darley Dale and Wirksworth accounting for 60% of the allocation in all. This must raise doubts about the delivery of the Council's housing requirement within the Plan period.

Within the Tier 3 villages, a total of 13 housing sites have been allocated amounting to 503 dwellings (or just 14% of the total allocated dwellings) within 4 settlements. However, many of these housing allocations already have planning consent at least in outline. For example,

both Site HC2(g) at Brailsford and sites HC2 (m) and HC2(n) in Doveridge have outline planning consent and others are also well advanced in gaining consent.

We supported Policy S10 in our representations on the Pre-Submission Local Plan, (dated 22nd September 2016), insofar as we welcomed the recognition that the growth of sustainable communities should be supported. However, we noted that the interpretation and the implementation of the policy would be critical. We are not convinced that the housing allocations necessarily adhere to the criteria in Policy S10 in satisfying the sustainable growth of the Tier 3 communities or catering for their wider housing needs.

Brailsford is categorised as one of those 'sustainable' locations and one of the 4 settlements where housing sites have been allocated. Brailsford is arguably the most sustainable of the Tier 3 villages within the Derbyshire Dales, insofar as it has a broad range of local services, including a brand-new school, a regular hourly bus service serving Derby and Ashbourne, several shops, cafes, pub and a modern medical centre. Above all, however, it is within 20 minutes' drive of Derby with its full range of services, extensive employment and broad range of social, administrative and cultural activities. Within the previous Derbyshire Structure Plan Brailsford was categorised as being within the Derby Housing Market Area and has a close affinity with the City.

Brailsford does not therefore share the 'deep rural or remote' character of many of the Derbyshire Dales Tier 3 villages since it is easily accessible on the main A52 road from both Derby and Ashbourne. Yet despite its proximity to jobs and services, it still has only 3 small allocations including 114 plots (or an average of just under 6 per year for the whole plan period). One of these, Site HC2(g) Luke Lane/Mercaston Lane, was introduced at a late stage in the process as a result of a successful planning consent. On the other hand, one site proposed at the draft stage (adjacent to Throstlenest Way) has actually been omitted from the final list of sites, arguably leaving scope for inserting an alternative site to replace it.

In our view therefore, Brailsford is highly suitable for modest growth and the 3 sites allocated in the Local Plan – HC2(e), HC2(f) and HC2(g) do not provide sufficient scope to satisfy the needs of the wider community. Whilst some of the Brailsford community are clearly resistant to change, this should not be the main consideration in guiding the Council. We note that Brailsford's allocation is only just over half that of Doveridge, which is a similar type of village – easily accessible from the A50 and close to Uttoxeter. More important, we are not convinced that the best sites have been chosen within Brailsford. We undertook an alternative comparative site assessment for Brailsford at the Draft Plan stage which led to different results (see Appendix 1 attached).

We believe there is scope to allocate additional land close to the village centre which would be both desirable and sustainable. My client is promoting a site for up to 5 hectares called 'Brailsford Green' on the south west side of Brailsford well integrated with the village, of which a modest part can be developed for up to 50 dwellings. (See Appendix 2). This proposal has been tested through a landscape assessment, a highway & access technical report and a heritage assessment. It has also been the subject of a local public exhibition and received a generally positive response from people who attended the event.

Issue 2. Housing Allocations.

Are the sites deliverable in the timescales envisaged by the SHELAA having regard to constraints, infrastructure and viability?

Most of the proposed housing site allocations within the Tier 3 villages are modest in scale and therefore should be capable of being delivered within the timescales envisaged within the SHELAA. The largest of the allocated sites at Derby Road/Hall Drive Doveridge (at 85 dwellings) was promoted by Gleasons and already has outline planning consent and Reserved Matters consent is now being sought by a national housebuilder. There are no other sites with a planned capacity of over 50 dwellings.

Concerns have been raised over the deliverability of some of the larger quarry sites and the Ashbourne Airfield, but the rural settlement sites are not believed to have any over-riding physical or policy constraints. They are mostly quite small. This is consistent with the scale of the local communities which tend to need a selection of smaller developments to give variety and choice for the home-buyer and limit the impact on the settlement. It is also consistent with the Government's Housing White Paper which urges Local Authorities to allocate small sites both to speed delivery, widen choice and draw in smaller housebuilders to extend the capacity of the housing market and appeal to local businesses.

In terms of the selection of sites, we are concerned however that the Landscape Sensitivity Study work undertaken by Wardell Armstrong and published in September 2015 appeared to use the draft housing allocations as a starting point in assessing their impact. This seemed to result in other sites being rejected when a more objective analysis might have resulted in a different set of sites. Landscape consultants, Liz Lake & Associates, acting on behalf of my client has undertaken a critique of this work in relation to Brailsford highlighting the strengths of our site south-west of the village in comparison.

It is not possible to assess each and every rural site according to their infrastructure availability and financial viability without much more detailed information and background work. This will no doubt be discussed at the EIP hearing.

Issue 3. Settlement Boundaries.

Are the settlement boundaries of the 3rd tier villages justified?

There are two different approaches for choosing the extent of development in rural settlements, either firstly, to omit settlement boundaries on the grounds that they are too inflexible and throttle potential development opportunities – and then apply a criteria based approach, or secondly, to survey each settlement carefully and allocate specific areas of land and then draw boundaries around the settlement to avoid further spread.

We feel that there are merits of both approaches, but that if settlement boundaries are drawn, they must be undertaken thoroughly (not simply by drawing lines around back gardens to exclude all future development) and must be capable of review.

Our concern about the treatment of Brailsford within the Local Plan is that a decision has clearly been taken in preparing the plan (and defining the proposed housing sites), that:-

firstly, the village should grow to the north of the A52, when in practice most of the facilities within the village lie to the south of the road (with the exception of the new school which was provided by a developer who built a site to the north). This seems illogical. We are not aware that any local public consultation has been held to consider this issue and hence the direction of growth is simply occurring by default, and

Secondly, an implicit decision appears to have been made to apply a cordon sanitaire around Brailsford Conservation Area which encompasses the older part of the village, when a more logical and sensitive solution would be to blend well designed new development around the edge of the village core to create a more cohesive settlement form and deliver public open space which relates to the older part of the village.

The scheme presented to the Council by my client in February 2016 and tabled at the local exhibition in April 2016 achieves this aim, as well as finding a much more suitable location for the village allotments away from the busy A52 road on land controlled by my client.

Issue 4. Infrastructure.

Will the infrastructure to support the scale of development proposed be provided in the right place and at the right time?

The scale of development being proposed in the rural settlements is mostly below that which would trigger major infrastructure concerns. Few roads for example have capacity issues where an additional 50-100 dwellings would trigger a capacity problem, albeit there may be a case within Doveridge for example where the cumulative impact of development leads to pressure for health facilities (which are not currently available locally). In this case, financial contributions are being sought for the surgery in the neighbouring Sudbury village.

In Brailsford's case, a health centre and surgery already exists which serves a fairly wide rural area. A new primary school has recently been built and unlike other villages, it has a local shop which will benefit from additional custom. Similarly, local services such as buses which benefit from extra passengers, cafes and pubs which rely on local support as well as passing trade and also smaller specialist shops, of which there are several in Brailsford, benefit from growth in population, giving greater security that the facilities and services will continue into the future for the rest of the community.

There is also scope within Brailsford to use the delivery of new sites to bring added benefits to the village – such as a new Brailsford Green – with recreational facilities which can be enjoyed by everyone. This can be provided both in the right place and at the right time.

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