

Session 11, Matters 10 and 11.

Statement by Dr William Bevan, Representer.

I am representing as a resident of Wirksworth.

I believe there are a number of serious flaws in the allocation of development sites and the 2016 consultation process during the drafting of the DDDC Local Plan.

- 1) The Local Plan does not recognise that one half of the DDDC housing area is in the Peak District National Park LPA. It is an unreasonable burden on DDDC towns outside of the National Park to shoulder the burden of meeting all of the OAN in half the authority's area. The OAN has to be reduced by a percentage of around 50% to take this into account.
- 2) The number of proposed houses in the Land at Middle Peak Quarry site increased from approximately 250 to 645 between the May and July consultation rounds. What is the evidence that the first round of consultations produced a request for this level of increased housing numbers from Wirksworth? This suggests two things:
 - a) DDDC being led by a landowner seeing a commercially driven development opportunity rather than of local need and demand.
 - b) That the consultation was little more than a public relations exercise and that public submissions did not influence the site allocations in Wirksworth. This leaves little faith in the plan drafting process.
- 3) By focusing development on existing towns, the proposed site locations and numbers of houses at each site overwhelms local infrastructure in those towns, especially in relation to water supply, waste water removal and drainage, traffic congestion and pollution, school places and health centre capacity.
- 4) There has been no research undertaken by DDDC on the impact the focus on development at existing towns will have on town air pollution levels as a result of increased car journeys, and whether resulting levels will be within or in breach of UK air quality standards.

Specific points in relation to strategic site allocations at Middleton Road/Cromford Road (DS6) and Middle Peak Quarry (DS7).

The total number of new homes proposed in the local plan for Wirksworth comes to 771. Taking a not-unreasonable average occupation rate of 3 people per home, a total of approximately 2300 people, this is a 46% increase in the town's population compared to the 2011 census. This is an unsustainable population increase which the town's infrastructure has not the capacity to take, which will lead to the town breaking air pollution guidelines and will irretrievably damage the town's character.

This development does not seek to satisfy the identified social and economic needs of the town's residents. The research has not been undertaken to identify these needs, therefore the plan is not designed to meet them.

The site allocation protection at Middleton Road/Cromford Road will significantly damage an important area of open and green space adjacent to the town.

The site allocation protection at Middleton Road/Cromford Road will significantly impact on the setting of the Nether Ratchwood and Rantor lead mine Scheduled Monument (no. 1009712) and

damage important and integral features of these mines that are out-with the scheduled area.

Any development plans at Middleton Road/Cromford Road needs to retain the location earmarked by DCC for a new, combined primary school to ensure it encourages walking/cycling to school in order not to increase the numbers of daily car journeys. Any alternative site proposed for a school at Middle Peak Quarry is too far from the town centre to encourage walking/cycling amongst pupils.

The site allocation boundary at Middle Peak Quarry is of no use in identifying whether future development should take place at this site as it includes green fields to the west of Middle Peak Quarry, unstable areas of the quarry unsuitable for development and lagoons. This boundary map needs to be redrawn to identify solely the area within the quarry where development can be undertaken. The fields should be specifically excluded from the site allocation boundary to preserve and enhance the open spaces around the town.

The settlement development boundary for Wirksworth has been redrawn between the May 2016 consultation and August 2016 draft plan to take within it Middle Peak Quarry without consultation with and evidence for support from Wirksworth residents. This comprises a large westwards extension of the settlement boundary compared to the Wirksworth Neighbourhood Plan. As the latter plan was accepted by a referendum in Wirksworth, major changes to the plan's fundamental structuring policies should not be proposed or undertaken without thorough public consultation and agreement at the Neighbourhood Plan level.