



**Derbyshire Dales District Council Local Plan  
Sustainability Appraisal Adoption Statement**

**Prepared on behalf of:  
Derbyshire Dales District Council**

**Date:** December 2017

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## Quality Management

Issue/revision	Issue 1	Revision 1	Revision 2	Revision 3
Report Status	Issue 1			
Date	15/12/17			
Prepared by	V Pearson			
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Project number	C0115			

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## 1 Introduction

The Derbyshire Dales Local Plan has been subject to a Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA). This document is the SA Adoption Statement.

An SA Adoption Statement is required as part of the process for adopting a Local Plan. The local planning authority has to make publicly available a copy of the plan and an SA Adoption Statement, in line with the Planning and Compulsory Purchase Act (2004) and in accordance with the SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 16(3) and (4)). The SEA Regulations require the statement to contain the following:

- how environmental considerations have been integrated into the plan or programme (see Section 2 of this document);
- how the environmental report has been taken into account (see Section 2 of this document);
- how opinions expressed in response to:
  - the invitation in Regulation 13(2)(d); and
  - action taken by the responsible authority in accordance with Regulation 13(4); have been taken into account (see Section 3 of this document);
- How the results of any consultations entered into under Regulation 14(4) have been taken into account (see Section 3 of this document);
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with (see Section 4 of this document); and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (see Section 5 of this document).

## 2 How sustainability and environmental considerations and the Sustainability Appraisal Report have been integrated into the Local Plan

### 2.1 Scoping

An SA Scoping Report for the Local Plan was produced in August 2015 to establish the scope of the SA and ensure that the SA process identified and addressed the key sustainability issues for spatial planning in Derbyshire Dales District. As a part of the scoping stage, information collected was used to develop an “SA Framework”, or set of sustainability objectives (see Table 2.1). The ‘SA Framework’ was consulted on as part of the SA Scoping Report in August / September 2015 and was used to structure the appraisal of various components of the Local Plan, including alternative options.

### 2.2 Appraisal

#### 2.2.1 What has been appraised

The Local Plan, and its reasonable alternatives, have been appraised against the SA Framework in several iterations. The following has been appraised through the SA:

- Three District Wide Strategic Options;
- 50 options for site allocations;
- Appraisal of new village concept as an alternative way to deliver the Objectively Assessed Housing Need (OAHN); and
- A suite of Local Plan policies comprising strategic policies and then specific policies under the themes of ‘Protecting Derbyshire Dales Character’; ‘Healthy and Sustainable Communities’, ‘Strengthening the Economy’ and eight site allocation policies.

#### District Wide Strategic Options

The following options were subjected to appraisal:

- Option 1: Meeting Affordable Housing Needs – 265 per annum (5300);
- Option 2: OAHN – 322 dwellings per annum (6440); and
- Option 3: OAHN Plus – 360 dwelling per annum (7200).

The relative sustainability performances of the options were reported back to the District Council and consulted on in the SA Report. The SA appraisal findings informed the choice of strategic option to take forward. The findings of this appraisal are reported in the full SA Report Part 3.

### Site Allocation Options

50 reasonable site allocation options were identified through the District Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) and appraised to identify their effects in relation to the SA Framework. The performance of each site option was reported to the District Council and consulted on in the SA Report. The findings of this appraisal are reported in the full SA Report Part 3.

### New Village Concept Option

An alternative approach to meeting the Objectively Assessment Housing Need (OAHN) was also appraised which would deliver some new housing to meet identified needs in the form of a new village. The full appraisal findings can be found in the SA Report, Part 3, Annex A.

### Local Plan Objectives

The Local Plan Objectives were compared with the SA Objectives in order to appraise whether the Plan Objectives address the SA Objectives and where potential conflicts exist. No changes were made to the Local Plan objectives following the SA.

### Local Plan Policies

The policies in the Local Plan were subjected to an initial round of appraisal as a part of the preparation of the Derbyshire Dales Local Plan – Draft Plan version and mitigation and enhancement measures were put forward. Mitigation was put forward in order to address the significant negative effects, minor negative effects and uncertain effects initially identified within the appraisal. Mitigation has taken the form of changes to policy wording and the alteration of the boundaries of the sites allocated for development in order to avoid development of more sensitive areas (e.g. in relation to biodiversity, ecological sites, flood risk, landscape and visual impacts and heritage assets).

The document entitled "Derbyshire Dales Local Plan – Draft Plan Sustainability Appraisal Report Part 3: Results of the Sustainability Appraisal and Proposed Monitoring Strategy Annex B: Findings of the Appraisal of the Draft Local Plan Policies, Mitigation and Responses to Mitigation" (April 2016) records the findings of the initial round of appraisal and the responses to the mitigation and enhancement measures put forward at the Draft Plan stage. This document can be accessed via <http://www.derbyshiredales.gov.uk/planning-a-building-control/local-plan-2015-16/local-plan-consultation>.

Mitigation and enhancement measures were also put forward at later stages of the SA, as appropriate, for example, if a new policy was introduced or policy wording was altered.

## **2.2.2 How policies and alternatives have been appraised**

Options and policies have all been appraised against the SA objectives set out within the SA Framework. The SA Framework is presented in Table 2.1. Each SA Objective is also supported

by a number of decision-making criteria. The SA Objectives and the decision-making criteria questions have all been generated from the identification of key issues affecting the District and targeted consultation in accordance with the SEA Regulations.

Potential effects have been identified against each SA Objective using the notation set out in Table 2.2.

<b>Table 2.1: SA Framework</b>		
(SA Objectives and Decision-Making Criteria Screened out of the appraisal of site options are shown in grey)		
	<b>Sustainability Appraisal Objective</b>	<b>Decision Making Criteria</b>
<b>1</b>	To maintain good local air quality and to minimise noise and light pollution	<ol style="list-style-type: none"> <li>1. Will it maintain or improve local air quality?</li> <li>2. Will it avoid adverse impacts from noise?</li> <li>3. Will it reduce the extent of the area defined as 'tranquil'?</li> <li>4. Will it minimise light pollution?</li> </ol>
<b>2</b>	To protect and enhance favourable conditions on SSSI's, SPAs, SACs and other wildlife sites	<ol style="list-style-type: none"> <li>1. Will it protect and promote effective management of SPAs and SACs in the LP area and its surrounds?</li> <li>2. Will it help to protect and enhance other designated sites e.g. SSSIs, County Wildlife Sites, LNRs etc.?</li> </ol>
<b>3</b>	To protect and improve biodiversity, geo-diversity	<ol style="list-style-type: none"> <li>1. Will it conserve and enhance habitats in the Biodiversity Action Plan?</li> <li>2. Will it conserve and enhance species diversity and in particular avoid harm and increase the ranges of protected species?</li> <li>3. Will it provide opportunities for new habitat creation?</li> <li>4. Will it protect geo-diversity?</li> <li>5. Will it improve the ecological quality and character of open spaces?</li> <li>6. Will it maintain and enhance woodland cover and management in appropriate areas?</li> <li>7. Will it maintain or enhance tree cover?</li> </ol>
<b>4</b>	To support the development of linked green spaces and make provision for their long term management	<ol style="list-style-type: none"> <li>1. Will it help to provide accessible green space or green infrastructure?</li> <li>2. Will it prevent the fragmentation of habitats?</li> <li>3. Will it help to provide links between green spaces or help to deliver/support other ecological networks?</li> <li>4. Will it support the natural capital of the District?</li> <li>5. Will it improve climate change adaptation?</li> </ol>
<b>5</b>	To minimise energy use and to develop the area's renewable energy resource	<ol style="list-style-type: none"> <li>1. Will it help to minimise energy use and encourage energy efficiency in new and existing buildings and infrastructure?</li> <li>2. Will it lead to a higher proportion of buildings with sustainable design features?</li> <li>3. Will it lead to an increased proportion of energy produced and supplied from renewable sources, (including on-site)?</li> <li>4. Will the design be resilient to the effects of climate change?</li> </ol>

<b>Table 2.1: SA Framework</b>		
(SA Objectives and Decision-Making Criteria Screened out of the appraisal of site options are shown in grey)		
	<b>Sustainability Appraisal Objective</b>	<b>Decision Making Criteria</b>
<b>6</b>	To protect and improve the safety and environmental quality of streets and estates	<ol style="list-style-type: none"> <li>1. Will it help to create streets and estates where people feel safe?</li> <li>2. Will it make a positive contribution to community cohesion?</li> <li>3. Will it help to improve the quality and quantity of green space on streets and estates?</li> <li>4. Will it help to improve the design quality of streets and estates?</li> </ol>
<b>7</b>	To support the development of a local economy based on high skill and high wage jobs; including by the delivery of the necessary premises, sites and infrastructure	<ol style="list-style-type: none"> <li>1. Will it increase the quality and choice of local employment?</li> <li>2. Will it support the growth of higher skilled economic sectors?</li> <li>3. Will it result in more highly paid, highly skilled local jobs within the area and thus reduce commuting out of the area?</li> <li>4. Will it provide new employment premises?</li> <li>5. Will it improve business infrastructure and provide attractive sites for modern businesses?</li> </ol>
<b>8</b>	To support the development of attractive, vibrant and distinctive town centres	<ol style="list-style-type: none"> <li>1. Will it help to support the diversity and vitality of town centres?</li> <li>2. Will it reduce the number of people travelling out of the area for retail and leisure?</li> <li>3. Will it encourage the use of locally sourced services and products in the economy?</li> </ol>
<b>9</b>	To encourage tourism development and to promote the area as a tourist destination	<ol style="list-style-type: none"> <li>1. Will it lead to an increase in the number of people staying overnight in the area?</li> <li>2. Will it lead to an increase in visitor spend in the area?</li> </ol>
<b>10</b>	To improve health and reduce health inequalities	<ol style="list-style-type: none"> <li>1. Will it help to improve health and reduce health inequalities?</li> <li>2. Will it encourage walking, cycling and a reduction in private car use?</li> <li>3. Will it help to ensure health services are provided alongside development?</li> </ol>
<b>11</b>	To reduce deprivation in key areas	<ol style="list-style-type: none"> <li>1. Will it help to reduce deprivation in affected parts of the District?</li> </ol>
<b>12</b>	To provide everybody with access to an affordable home	<ol style="list-style-type: none"> <li>1. Will it support a range of housing types and sizes, including affordable housing units and “Lifetime Homes”, to meet all needs?</li> <li>2. Will it ensure that there is an adequate supply of housing development land to meet local needs?</li> </ol>
<b>13</b>	To protect and enhance the character and appearance of the landscape, including cultural landscape assets, as well as the area’s other natural assets and resources	<ol style="list-style-type: none"> <li>1. Will it protect and enhance landscape quality, character and distinctiveness?</li> <li>2. Will it avoid loss of - and damage to - the best agricultural land?</li> <li>3. Will it make use of previously used / brownfield land and buildings?</li> <li>4. Will it safeguard individual landscape features such as hedgerows, ponds etc.?</li> </ol>

<b>Table 2.1: SA Framework</b>		
(SA Objectives and Decision-Making Criteria Screened out of the appraisal of site options are shown in grey)		
	<b>Sustainability Appraisal Objective</b>	<b>Decision Making Criteria</b>
<b>14</b>	To provide better opportunities for people to participate in cultural, leisure and recreational activities	<ol style="list-style-type: none"> <li>1. Will it help to improve access to sports facilities?</li> <li>2. Will it provide opportunities for engagement in a range of cultural activities?</li> <li>3. Will it create new allotments where there is a demand?</li> </ol>
<b>15</b>	To conserve and enhance town/village-scape quality, archaeological and heritage assets along with their settings	<ol style="list-style-type: none"> <li>1. Will it respect, maintain and strengthen local distinctiveness and sense of place?</li> <li>2. Will it promote high quality urban and rural design?</li> <li>3. Will it preserve and enhance the character or appearance of conservation areas and their settings?</li> <li>4. Will it preserve or enhance heritage assets and their settings?</li> <li>5. Will it preserve or enhance archaeological remains and their settings?</li> </ol>
<b>16</b>	To reduce the number of journeys made by car, within and to and from the area	<ol style="list-style-type: none"> <li>1. Will it help to meet local needs locally?</li> <li>2. Will it facilitate safe walking and cycling?</li> <li>3. Will it facilitate the use of public transport?</li> <li>4. Will it deliver opportunities to relieve traffic congestion?</li> </ol>
<b>17</b>	To improve access to jobs, services and facilities	<ol style="list-style-type: none"> <li>1. Will it help to reduce the distances people have to travel on a regular basis for education, employment and services?</li> <li>2. Will it help to improve access to services and facilities for those living in rural or remote settlements, or experiencing other access constraints?</li> </ol>
<b>18</b>	To ensure sustainable management of water resources and to minimise the risk of flooding	<ol style="list-style-type: none"> <li>1. Will development exacerbate flood risk for any source?</li> <li>2. Will it support the use of Sustainable Drainage Systems?</li> <li>3. Will it encourage water efficiency and demand management?</li> <li>4. Will it avoid deterioration and enhance the ecological status of water bodies?</li> <li>5. Will it contribute toward achieving Water Framework Directive objectives as set out in the Humber River Basin Management Plan?</li> </ol>

<b>Symbol</b>	<b>Definitions of Significance of Effects Against the SA Objectives</b>
++	Policy or option supports the achievement of this objective and all of the decision making criteria and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre
+	Policy or option supports the achievement of this objective although it may have only a minor beneficial effect
0	Policy or option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the appraisal at this stage
-	Policy or option appears to conflict with the achievement of this objective and may result in minor adverse effects
--	Policy or option works against the achievement of this objective and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.

For the District-Wide Strategic Options and the Local Plan policies, potential effects were identified with respect of all of the SA Objectives within the SA Framework. However, for the appraisal of site allocations, an initial screening appraisal was undertaken to identify the SA Objectives, against which significant effects could occur in order to focus the detailed appraisal against of each site. This identified several SA objectives against which no significant effects were likely to occur. The appraisal of the site allocation options therefore focussed on the SA Objectives and decision-making criteria set out within Table 2.1.

### **3 How consultation comments have been taken into account throughout the development of the Local Plan**

#### **3.1 Introduction**

The public and environmental authorities have been given the opportunity to comment on the SA at key stages throughout the plan's development.

#### **3.2 Scoping**

The Scoping Report (now forming Part 2 of the SA Report) was consulted on with the statutory consultees (Environment Agency, Heritage England and Natural England) for a 6-week consultation period between 6th August and 18th September 2015. Other interested parties were also invited to comment on the report and the relevant documents were made available on the Councils website. The consultation period was extended from the legally required 5-week period in accordance with best practice in order to allow sufficient time for consultees to respond during the summer vacation period.

Following the consultation period, the comments received on the Scoping Report were reviewed and changes and updates were made to the Scoping Report in response to the comments. The log of comments and response to them are presented within Appendix A. Most of the changes to the Scoping Report were the addition of baseline data, issues and documents within the review of relevant other plans, policies and programmes. Key changes were made to the SA Framework to ensure that it reflected the key sustainability issues in the District.

#### **3.3 SA Reports**

Two iterations of the SA Report were consulted on alongside the Derbyshire Dales Local Plan – Draft Plan during April and May 2016 and the Derbyshire Dales Local Plan – Pre-Submission (Publication) Local Plan during August and September 2016.

A further iteration of the SA Report was consulted on alongside the Inspector's Modifications in July 2017.

The public and the statutory consultees (Environment Agency, Heritage England and Natural England) were invited to comment on the SA Reports. They were specifically sent to the following organisations for comment:

- Environment Agency;
- Heritage England;

- Natural England;
- Derbyshire Economic Partnership;
- Lowland Derbyshire Local Nature Partnership;
- Peak District Local Nature Partnership;
- Chesterfield Borough Council;
- High Peak Borough Council;
- Peak District National Park;
- Amber Valley Borough Council;
- Derby City Council;
- South Derbyshire District Council;
- North East Derbyshire District Council;
- Bolsover District Council;
- Derbyshire County Council; and
- East Staffordshire Borough Council.

Following each consultation period, the comments received have been considered and any necessary changes made to the Scoping Report and SA Reports. Comments received on the SA Reports have also been reviewed by the plan authors at Derbyshire Dales District Council for relevance to the Local Plan. Actions taken in response to the consultation comments can be found in Appendix A. Actions have included:

- Revision of site assessments using revised baseline data;
- Revision of mitigation / policy requirements in relation to site allocations;
- Review of assessment to ensure appropriate site allocations were considered in cumulative effects assessments; and
- Additional documents were added to the review of other relevant plans, policies and programmes.

## 4 The reasons for choosing the Local Plan as adopted, in the light of the other reasonable alternatives dealt with

### 4.1 Introduction

The options considered in the development of the Local Plan are the Strategic District-wide Strategy options, the new village concept and the site allocations options. These are detailed in Section 2.2 above.

### 4.2 Choice of Local Plan Strategy

The rationale for identifying the preferred Strategic District-wide Strategy option for the Local Plan has been informed by a range of relevant factors, including the SA, feedback from the 'Key Issues' consultation undertaken in November 2015 at which the three strategic District-wide Strategy options were presented, evidence identifying the OAHN<sup>1</sup> and evidence on land availability.

The SA of the Strategic District-wide Strategy options identified the risks of significant negative effects associated with each of the options. On the basis of the precautionary principle, it was considered that Option 3 with the highest growth scenario would represent the highest risks of environmental effects.

In respect of social and economic effects, the appraisal concluded that Option 1 may result in fewer beneficial social and economic effects than Options 2 and 3 as it would not deliver the OAHN, thus worsening the affordability of the housing market.

Option 1 would not provide any support for the growth of the Districts economy with no provision made for growth created by new jobs. Option 2 provided the opportunity to deliver some affordable housing to meet future needs and provided an uplift in the number of jobs, therefore providing positive effects over Option 1. Option 3 would provide growth above the OAHN, allowing for greater choice in the housing market with positive impacts on affordability and deliver enhanced economic growth.

The 'Key Issues' public consultation provided the opportunity for feedback on the three district wide strategy options for the Local Plan with the following question posed:

*“Should the District Council between 2013-2033 aim to accommodate 5,300 dwellings; 6,440 dwellings; or 7, 200 dwellings?”*

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<sup>1</sup> Assessment of Housing and Economic Development Needs on behalf of Derbyshire Dales District Council, GL Hearn (September, 2015)

The effects of the options identified through the SA were presented in the consultation material<sup>2</sup>.

The majority of responses to the Key Issues consultation expressed a desire for the lowest of the three potential housing targets. This was consistent with previous consultation undertaken on the now withdrawn Local Plan. However, with a clear description of the social, economic and environmental impacts of the options and an explanation of the issues facing the District in terms of housing pressures, 45% of respondents expressed a preference for a figure that matched OAHN or above, i.e. Option 2 and 3.

Those supporting Option 2 recognising that this option would meet the needs of the anticipated population changes in the District as well as providing benefits for the local economy and provision of affordable housing.

Responses advocating Option 3 cited the additional benefits that a higher growth scenario would provide in terms of providing housing to meet the needs of young people who are increasingly being forced to move away from the area, as well as associated benefits to the local economy.

The findings of the Assessment of Housing and Economy Development Needs<sup>3</sup> undertaken by G L Hearn on behalf of the District Council concluded that the OAHN should be set at 322 per annum or 6,440 dwellings in the period 2013-2033. Option 2 is therefore the OAHN derived from an objective analysis of the evidence, to the exclusion of any policy objectives and value judgements.

Accordingly, given that the work undertaken by G L Hearn follows the advice in the NPPG, it is considered that Option 2 represents a robust assessment of housing need across the Derbyshire Dales up to 2033.

Taking account of the consultation responses and the conclusions of the SA, the District Council resolved that the OAHN for the Derbyshire Dales Local Plan should be fixed at 6,440.

Option 1 was rejected because it would not deliver the OAHN, with negative social and economic effects envisaged. Option 3 was rejected due to the significant adverse environmental effects predicted due to a higher housing target when compared to Option 2, which may require constrained and unsuitable sites to be required for development.

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<sup>2</sup>

[http://www.derbyshiredales.gov.uk/images/documents/Y/Your\\_Local\\_Plan\\_publication\\_November\\_2015.pdf](http://www.derbyshiredales.gov.uk/images/documents/Y/Your_Local_Plan_publication_November_2015.pdf)

<sup>3</sup> Assessment of Housing and Economic Development Needs on behalf of Derbyshire Dales District Council, GL Hearn (September, 2015)

Both the NPPF and Planning Practice Guidance make it clear that an authority's housing provision target or requirement does not necessarily have to equal its OAHN. Evidence of the area's deliverable and sustainable housing capacity, defined with reference to constraints outlined in the NPPF should also be considered.

Consequently, in setting the District-wide Strategy, regard to the impact of housing development on the District Council's wider policy objectives and priorities and any cross boundary un-met need which the authority may be able to accommodate should be considered.

Whilst the NPPF makes it clear that Local Plans should plan to meet the full OAHN (Option 2), supply constraints are a relevant factor to take into consideration. Evidence on supply factors undertaken as part of the preparation of the revised SHELAA demonstrated that there is insufficient suitable land available across the plan area to meet Option 3.

The NPPF makes it clear that the Local Plan should plan to meet the full OAHN (6,440 – Option 2). In the Draft Local Plan, evidence on supply factors undertaken as part of the preparation of the revised SHELAA at that time indicated that there was insufficient land available across the plan area to meet the OAHN. However, as a result of consultation on the Draft Plan and revised evidence from the SHELAA, the District Council has concluded that there is sufficient capacity to allocate land for 3,208 dwellings for the period up to 2033. Taking into account the contribution from development in the Peak District National Park, existing completions and commitments and windfall development, the District Council has at this time sufficient land for 6,591 dwelling up to 2033, which acknowledges that not all the commitments are likely to be implemented during the Plan Period. The Derbyshire Dales Submission Local Plan therefore plans to meet the OAHN.

### **4.3 Choice of Local Plan Allocations**

The selection of site allocation options has been informed by work undertaken as part of the preparation of the SHELAA. The methodology adopted in the preparation of the SHELAA follows that which is set out in the NPPF and the National Planning Practice Guidance and has been undertaken in a two stage process, set out in Appendix B.

Sites were rejected as reasonable options and potential sites for allocation in the Local Plan if they failed Stage A or Stage B of the SHELAA assessment process. These sites were not considered suitable, available or achievable for development and the reasons for rejecting these sites are set out within Appendix B.

Sites that failed Stage A of the assessment were considered to be in locations wholly unsuitable for development or subject to significant strategic constraints.

Sites failed Stage B of the assessment and were rejected as options for allocation in the Pre Submission Draft Local Plan for one or more of the following reasons:

- *Site not suitable* – based on the outcome of the SHELAA, the site is subject to significant constraints that cannot be overcome. For example, significant highway constraints – a safe and secure access cannot be achieved; significant adverse impacts on natural environment assets such as landscape, historic environment or biodiversity which are unlikely to be possible to mitigate, as provided in information by consultees including the County Highways Authority, Council Officers and the Derbyshire Wildlife Trust.
- *Site not available* – sites were assessed to determine whether they are available for development. A site is considered available for development, when there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips or operational requirements of landowners (para 3-020-20140306 NPPG).
- *Site not achievable* – sites were assessed to determine if there would be a reasonable prospect that housing will be developed on the site at a particular point of time and included a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period.
- *Site capacity below 10 dwellings* – Stage B of the assessment involved an assessment of the potential dwelling capacity on the site, informed by the characteristics of the site, the proportion of the site that may be deemed developable and the application of an average density of 28 dwellings per hectare. Where sites were considered developable (i.e. passed Stage B) but resulted in a potential dwelling capacity of less than 10 dwellings, these sites were rejected as options for allocation within the emerging Local Plan and are assumed to be sites which will come forward as windfall sites. The Submission Local Plan only allocates sites with a capacity of 10 dwellings or more.

Sites that passed Stage A and Stage B of the assessment and had a dwelling capacity of greater than 10 dwellings were considered to be available, suitable and achievable for residential development and taken forward as options for allocation within the Local Plan. No sites which passed Stage B have been rejected because the capacity of all of the sites is required to pursue the achievement of the chosen District-wide Strategy (and OAHN), which is 6,440 dwellings up to 2033. The new village concept has been rejected because no suitable large site was identified within the District and it was therefore not deliverable.

## 5 The Monitoring Framework

The SEA Regulations requires monitoring of the significant environmental effects of implementing the Plan. SA monitoring will cover the significant economic and social effects, as well as the environmental ones.

A finalised Monitoring Framework is presented in Table 5.1 below. This presents the measures that are to be taken to monitor the significant effects of the implementation of the Local Plan.

The monitoring procedures proposed are linked to the SA process, including the objectives, targets and indicators developed for the SA Framework, the baseline information and key sustainability issues, the likely significant effects expected, and the mitigation measures proposed.

Monitoring has been proposed where there are significant residual effects or uncertainties regarding significant effects in order to identify unforeseen adverse effects at an early stage and facilitating appropriate remedial action. The proposed monitoring can consider the baseline and the beneficial, cumulative, secondary and synergistic effects over the Local Plan's lifespan.

The policies and objectives of the Local Plan will be delivered in the context of the Local Plan as a whole and within the wider policy framework that sits alongside the planning system. It is the LPA's responsibility to monitor significant effects. For this reason, monitoring the sustainability effects of implementing the Local Plan will be undertaken and conducted as part of the overall approach to monitoring undertaken by the District Council. Accordingly, the proposals set out here will align with the Local Plan monitoring proposals.

A frequency for monitoring has been proposed.

<b>Table 5.1: Proposals for Monitoring the Sustainability Effects of Implementing the Derbyshire Dales Local Plan</b>			
<b>What needs to be monitored?</b>	<b>Indicators</b>	<b>Responsibility</b>	<b>Frequency</b>
Effects on the economy, tourism and town centre vitality	<ul style="list-style-type: none"> <li>• Average full time wage</li> <li>• Gross weekly earnings</li> <li>• Unemployment rates</li> <li>• Jobs density</li> <li>• Business starts/Enterprise births and business closures/enterprise deaths</li> <li>• Number of people with NVQ level 2 qualification and number of people qualified to NVQ level 4</li> </ul>	Government	Annual (monthly data is available)
	<ul style="list-style-type: none"> <li>• Rates of employment development within the district</li> <li>• Net change in employment land each year</li> <li>• Vacant or redundant employment sites redeveloped</li> <li>• Total amount of floorspace for town centre uses in town centres</li> <li>• Retail unit vacancy rates in all centres</li> <li>• Number of applications approved involving farm diversification</li> <li>• Percentage of occupied shop premises</li> <li>• Amount of floorspace developed for town centre uses</li> </ul>	Derbyshire Dales District Council (DDDC)	Annual
Effects on diversity and abundance of flora and fauna and geographical interests	<ul style="list-style-type: none"> <li>• Number of planning permissions granted against the advice of Natural England</li> <li>• Number of tree removals/replacements</li> <li>• Areas of woodland felling/planting</li> </ul>	DDDC	Annual
	<ul style="list-style-type: none"> <li>• Changes in areas of biodiversity importance</li> <li>• Percentage of Biodiversity Action Plan targets met</li> </ul>	Natural England / Derbyshire Wildlife Trust / DDDC	Annual
Effects on sites	<ul style="list-style-type: none"> <li>• Percentage of internationally and nationally designated sites in 'favourable' or 'unfavourable recovering' condition</li> </ul>	Natural England	Annual (periodic condition)

<b>Table 5.1: Proposals for Monitoring the Sustainability Effects of Implementing the Derbyshire Dales Local Plan</b>			
<b>What needs to be monitored?</b>	<b>Indicators</b>	<b>Responsibility</b>	<b>Frequency</b>
designated for their nature conservation importance			surveys available)
	<ul style="list-style-type: none"> <li>Number of planning permissions granted against the advice of Natural England</li> </ul>	DDDC	Annual
Effects on green infrastructure / natural capital	<ul style="list-style-type: none"> <li>Net change in green infrastructure network</li> <li>Amount (ha) of greenfield land developed</li> </ul>	DDDC	Annual
Air quality	<ul style="list-style-type: none"> <li>Achievement of air quality objectives within the District</li> <li>Percentage of residential development taking place within defined settlement boundaries</li> </ul>	DDDC	Annual
Effects on climate change and renewable energy generated	<ul style="list-style-type: none"> <li>Percentage of residential development taking place within defined settlement boundaries</li> <li>Percentage of commercial developments over 1,000m<sup>2</sup> built to achieve BREEAM good rating</li> <li>Amount of energy produced from renewable energy sources</li> <li>Amount of renewable energy capacity</li> </ul>	DDDC	Annual
	<ul style="list-style-type: none"> <li>CO<sub>2</sub> emissions for the District</li> </ul>	Government	Annual
Effects on landscape and townscape quality	<ul style="list-style-type: none"> <li>Percentage of appeals allowed where non-compliance with Policy PD1 is a reason for refusal</li> <li>Percentage of development on brownfield land</li> <li>Type and area of new open space provided for in section 106 obligations attached to residential developments</li> </ul>	DDDC	Annual

<b>Table 5.1: Proposals for Monitoring the Sustainability Effects of Implementing the Derbyshire Dales Local Plan</b>			
<b>What needs to be monitored?</b>	<b>Indicators</b>	<b>Responsibility</b>	<b>Frequency</b>
Effects on heritage assets	<ul style="list-style-type: none"> <li>Number of planning applications affecting sites designated for historical interest</li> <li>Amount of development having an adverse impact on the Historic Environment</li> </ul>	DDDC	Annual
	<ul style="list-style-type: none"> <li>Number of historic assets on the Heritage at Risk Register</li> </ul>	Historic England	Annual
Control of flood risk	<ul style="list-style-type: none"> <li>Number of planning applications granted permission contrary to advice of Environment Agency on flooding and water quality</li> </ul>	DDDC	Annual
	<ul style="list-style-type: none"> <li>Per capita water consumption</li> </ul>	Government	Annual
	<ul style="list-style-type: none"> <li>Progress with regards to Water Framework Directive Targets (as monitored by the Environment Agency)</li> </ul>	Environment Agency	Annual
Accessibility of jobs, services and facilities	<ul style="list-style-type: none"> <li>Percentage of residential development taking place within defined settlement boundaries</li> <li>Number of travel plans</li> <li>Percentage of essential infrastructure to support growth</li> <li>Number of bus shelters in new developments</li> <li>Percentage of major new residential development within 800m of a bus stop or rail station with at least an hourly service between 8am-6pm</li> </ul>	DDDC	Annual
	<ul style="list-style-type: none"> <li>Net change in off and on road cycle routes</li> </ul>	Derbyshire County Council	Annual
	<ul style="list-style-type: none"> <li>Proportion of people travelling to work by mode</li> </ul>	Government (Census)	Ten yearly
Effects on deprived areas,	<ul style="list-style-type: none"> <li>Amount of development achieving Secured by Design Standard</li> <li>Percentage of adults who are participating in sport and active recreation for 30 minutes or 3 or more days a week</li> <li>Percentage increase in the levels of participation by young people in sport, active recreation and cultural activities.</li> </ul>	DDDC	Annual

<b>Table 5.1: Proposals for Monitoring the Sustainability Effects of Implementing the Derbyshire Dales Local Plan</b>			
<b>What needs to be monitored?</b>	<b>Indicators</b>	<b>Responsibility</b>	<b>Frequency</b>
disadvantaged groups and health of the population	<ul style="list-style-type: none"> <li>• Amount of open space and sports facilities provided through all new developments</li> <li>• Number of people claiming disability living allowance/incapacity benefit/severe disablement allowance</li> <li>• Dwellings built to comply with part M category 2 of the Building Regulations-accessible and adaptable dwellings</li> <li>• Dwellings built to comply with Part M category 3 of the Building Regulations-wheelchair users</li> <li>• Number of permissions given for the creation of self-contained extensions or annexes for an elderly or disabled dependent</li> <li>• Percentage of applications where the loss of a sport, recreation, play facility or amenity green space is wholly mitigated by alternative provision</li> <li>• Net change in overall provision of sport, leisure and recreational facilities</li> <li>• Percentage of appeals allowed where non-compliance with policy PD5 is a reason for refusal</li> <li>• Developments permitted which result in loss of community facilities without compliance with criteria set out in Policy HC15</li> </ul>		
	<ul style="list-style-type: none"> <li>• Life expectancy</li> <li>• Prevalence of obese, overweight and healthy weight children in the district in reception classes and Year 6.</li> </ul>	Government	Annual
	<ul style="list-style-type: none"> <li>• CRI 2 No. of Antisocial behaviour incidents (criminal damage) per 1,000 population</li> <li>• CRI 8 Percentage of people who feel safe outside during the day (as monitored by the Police and Crime Commissioner survey work)</li> <li>• CRI 9 Percentage of people who feel safe outside at night (as monitored by the Police and Crime Commissioner survey work)</li> <li>• Recorded notifiable crimes</li> </ul>	Derbyshire Constabulary / Police and Crime Commissioner	Monthly / Annually
	<ul style="list-style-type: none"> <li>• Capacity in GPs surgeries/health clinic</li> </ul>	Clinical Commissioning Groups	Annual

<b>Table 5.1: Proposals for Monitoring the Sustainability Effects of Implementing the Derbyshire Dales Local Plan</b>			
<b>What needs to be monitored?</b>	<b>Indicators</b>	<b>Responsibility</b>	<b>Frequency</b>
Housing which meets local needs	<ul style="list-style-type: none"> <li>• Breakdown of both market and affordable housing completions into size (1 bed, 2 bed, 3 bed, 4 and over)</li> <li>• Net annual additions to the housing stock</li> <li>• Calculation of the five year housing land supply</li> <li>• Permission granted for residential development on allocated sites</li> <li>• Start of development on allocated sites</li> <li>• Gross affordable housing completions</li> <li>• Number of affordable housing completions on exception sites</li> </ul>	DDDC	Annual
	<ul style="list-style-type: none"> <li>• Median property prices</li> </ul>	Government	Annual (monthly data is available)

## Appendix A – Consultation Logs

### Scoping Report

The Scoping Report (now forming Part 2 of the SA Report) was consulted on with the statutory consultees (Environment Agency, Heritage England and Natural England) for a 6-week consultation period between 6th August and 18th September 2015. Other interested parties were also invited to comment on the report and the relevant documents were made available on the Councils website. The consultation period was extended from the legally required 5-week period in accordance with best practice in order to allow sufficient time for consultees to respond during the summer vacation period.

Responses were received from five consultees. The responses and the actions taken are logged in Table A.1. Following the consultation period, the comments received on the Scoping Report were reviewed and changes and updates were made to the Scoping Report in response to the comments.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
Chesterfield Borough Council	An appropriate range of plans and programmes have been consulted by DDDC in the preparation of the Scoping Report and all relevant plans and programmes that are of significance to the Derbyshire Dales Local Plan and sustainability have been included.	No action necessary
Chesterfield Borough Council	No additional information, facts or figures suggested for inclusion in the baseline information collected for the SA of the Local Plan.	No action necessary
Chesterfield Borough Council	DDDC have correctly identified the main sustainability issues and a broad range of suitable sustainability issues have been addressed.	No action necessary
Chesterfield Borough Council	Although the Scoping Report has correctly identified the potential significant effects of the Local Plan, and therefore the scope of the assessment, it could address the provision for and delivery of local housing need better. For example in table 3.1 Key Messages ensuring 'that there is an adequate supply of employment land to meet local needs' is specifically mentioned but there is no equivalent for housing. This is important given the weight placed on the five year housing land supply and the development implications that may result from not being able to demonstrate an adequate supply of housing land.	A new decision making criterion 'ensure that there is an adequate supply of housing development land to meet local needs' has been added to the SA Framework.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
Chesterfield Borough Council	The SA framework is appropriate however as mentioned above it could address the provision for and delivery of local housing need better.	Addressed above
Chesterfield Borough Council	The scoping report provides sufficient information to ensure that an appropriate SA can be carried out however as mentioned above it could address the provision for and delivery of local housing need better.	Addressed above
Derbyshire County Council	<p>The Scoping Report appropriately identifies most of the key sustainability issues and objectives relating to housing need and provision in the district. Some of the key negative consequences of insufficient housing provision are clearly set out in Section 4.8, particularly on health and well-being, community cohesion, increased housing costs, worsening affordability and increased commuting relating to employment needs.</p> <p>Many of the other key sustainability housing issues are appropriately referenced on pages 21 and 22 relating to house prices, age composition of the population, nature and condition of the existing housing stock etc.</p>	No action necessary
Derbyshire County Council	Support given to the recognition in section 4.8 that in order to promote sustainable patterns of development, the focus for additional housing should be in locations providing ready access to jobs, key services and infrastructure.	No action necessary
Derbyshire County Council	<p>The Scoping Report does not recognise the requirement set out in the National Planning Policy Framework (NPPF) for the District Council to seek to meet the full objectively assessed housing needs (OAHN) of the District in the Local Plan.</p> <p>It is considered that this requirement to meet the full OAHN of the District should be a specific key SA Objective of the Local Plan and included in Table 2.1. Draft Local Plan Objective SO10, as currently written, only seeks to 'facilitate the required housing growth for the plan area in sustainable and accessible locations'.</p>	<p>A new decision making criterion 'ensure that there is an adequate supply of housing development land to meet local needs' has been added to the SA Framework.</p> <p>It is not considered appropriate for meeting the OAHN should to form a decision-making criterion. The SA will test the comprehensive sustainability implications of meeting the OAHN.</p>
Derbyshire County Council	The Inspector presiding over the examination of the recently withdrawn Derbyshire Dales Local Plan Submission (DDLPS) raised soundness concerns that the level of housing provision proposed in the Local Plan was considerably below that required to meet the full OAHN of the District based	As above.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	on the most up-to-date population and household projections that were available at the time. It is noted that, since the Scoping Report consultation began, consultants commissioned by Derbyshire Dales District Council have reported on housing need across the District using the latest population and economic growth forecasts and concluded a total of 6,440 new homes would need to be provided over the plan period to 2033. It is important, therefore, that the need for the Local Plan to seek to meet the full OAHN of the District should be a key sustainability objective of the revised Local Plan from the outset.	
Derbyshire County Council	Section 3 of the main report and Annex A give no specific recognition of the key national policy requirement in Paragraph 47 of the NPPF that local authorities should seek to ensure that their Local Plans meet the full OAHN of the area for market and affordable housing, and identify a five year supply of deliverable sites to meet the identified need. Table 3.1 of the main report only refers to the need to 'enable housing growth and deliver a mix of high quality homes to meet local needs'. Table 7 of Annex A only refers to the need to 'plan for a mix of housing' and 'identify the size, type and tenure' of housing. The key policy requirements of Paragraph 47 of the NPPF should be appropriately referenced in the SA.	Section 3 of the main report and Annex A have been amended to give greater emphasis to requirements of the NPPF.
Derbyshire County Council	Whilst Annex B: Base Line Data provides an analysis of past population growth based on a comparison of 2001 and 2011 Census data, and current details of population structure based on the Office for National Statistics (ONS) 2013 Mid-Year Population Estimates there is no analysis in the baseline data of the growth in, or change in composition of, households in the District over the two census periods.	Annex B and section 4 of the scoping report have been amended to include this information.
Derbyshire County Council	There is no analysis in Section 4 or Annex B of the likely future growth in population and households in the District up to 2033, as evidenced by the 2012-Based Sub-National Population Projections and 2012-Based Sub-National Household Projections.  Section 4.11, as currently written, merely indicates that the 'population of the District is likely to continue to grow' and that 'migration is the key driver of population change'.	Annex B and section 4 of the scoping report have been amended to include this information.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	The 2012-based population and household projections above are two important pieces of key baseline evidence, which should be set out and analysed in the SA. Such an analysis would provide an important context for the scale of housing development that is likely to be required over the Plan period to 2033.	
Derbyshire County Council	The SA should refer to a key sustainability issue that historic levels of housing completions in the District, particularly over the last 10 years, have been significantly below the levels of housing development that are likely to be required over the Plan period, if the Local Plan is to meet the full OAHNs of the District. Some analysis is provided in Annex B of past housing completions, but in the context of previous Local Plan / Regional Spatial Strategy (RSS) housing targets.	This key issue has been highlighted in the SA report.
Derbyshire County Council	Although the need to make provision for the accommodation needs of Gypsies, Travellers and Travelling Showpeople is appropriately referenced in Table 3.1 of the main report as a national planning policy requirement, this need is not identified as a specific key sustainability issue for the District in either Sections 4.8: Housing or 4.11: Population and Equality.	This key issue has been highlighted in the SA report.
Derbyshire County Council	The Derby, Derbyshire, Peak District National Park Authority and East Staffordshire Gypsy and Traveller Accommodation Assessment 2014 (GTAA) published on 27 August 2015 contains a range of baseline data (as at 2014) on Gypsies and Travellers in Derbyshire Dales District, and projections of their future accommodation needs up to 2034, which will need to be taken into account in the final SA Report and Local Plan.	Annex B and section 4 of the scoping report have been amended to include this information.
Derbyshire County Council	With regard to the above two comments the need for the Local Plan to make provision for the future accommodation needs of Gypsies and Travellers should be a key sustainability objective of the SA	This key issue has been highlighted in the SA report.
Derbyshire County Council	It is welcomed that " <i>Protecting Peak District Character</i> " continues to be an objective of the Local Plan and SA.	No action required.
Derbyshire County Council	It is welcomed that landscape character is included within the scope of the SA. The objective for landscape protection and enhancement is fully supported, which recognises that the high landscape value of the District is a major factor in the appeal and desirability of Derbyshire Dales as a place to live and work, and as an economic resource. As a consequence 'Landscape Character and	No action required.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	Natural Resources' is carried forward as a key theme in the SA, which is supported.	
Derbyshire County Council	Although the key theme of 'Biodiversity and Green Infrastructure (GI)' is supported it is felt by DCC that it would be better to be split into two separate themes as GI is an all-encompassing term of which biodiversity is only one component.	A new green infrastructure objective has been added to the SA Framework.
Derbyshire County Council	GI is defined in Natural England's 'Green Infrastructure Guidance' (2009) as: <i>"A strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types"</i> . As such, GI is a cross-cutting theme that will relate to a number of other themes within the Local Plan and SA, including landscape character, climate change, health and well-being, leisure and recreation, accessibility etc. Consequently, it is considered that GI should not be considered only as a biodiversity asset, when clearly it would be likely to facilitate multiple public benefits in its own right.	As above
Derbyshire County Council	All issues and objectives relating to highways and transport have been appropriately considered in the SA.	No action required.
Environment Agency	The Water Framework Directive (WFD) should be added to Annex A. The WFD is European legislation which aims to protect and improve the water environment. The WFD divides the water environment into water bodies. These can include rivers, lakes, reservoirs, canals, groundwater etc. The WFD requires that there is no deterioration in the ecological health of water bodies and that water bodies should achieve the ecological objectives set out in a River Basin Management Plan.	This information has been added to Annex A.
Environment Agency	In regards to the above point Derbyshire Dales District Council sits within the Humber river basin district for which the relevant plan is the Humber River Basin Management Plan (RBMP). RBMPs set statutory objectives for each water body and summarise the measures needed to achieve them. As water is linked to land, they also inform decisions on land-use planning. The first	This information has been added to Annex A.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	<p>RBMPs were published in 2009 and the second cycle will be published by December 2015.</p> <p>The Humber River Basin Management Plan should therefore be added to Annex A.</p>	
Environment Agency	<p>Under the EU Floods Directive Member States are required to first carry out a preliminary assessment by 2011 to identify the river basins and associated coastal areas at risk of flooding. For such zones they would then need to draw up flood risk maps by 2013 and establish Flood Risk Management Plans focused on prevention, protection and preparedness by 2015.</p> <p>Derbyshire Dales falls within the Humber river basin district and the Humber FRMP will set out the proposed measures to manage flood risk from 2015 to 2021 and beyond. The draft FRMP was consulted upon from October 2014 until January 2015 and the final version is expected to be published in December 2015. The draft FRMP contains objectives and measures for the Derbyshire Derwent (Pages 89 – 104) and Dove (Pages 155 – 174) catchments which are of relevance to Derbyshire Dales.</p> <p>This information should be included in Annex A.</p>	This information has been added to Annex A.
Environment Agency	<p>Derbyshire County Council has a legal duty under the Flood and Water Management Act to produce a Local Flood Risk Management Strategy. The strategy is a document that explains how Derbyshire County Council, as Lead Local Flood Authority, will coordinate services from across the County with the key aim of mitigating flood risk.</p> <p>The Local Flood Risk Management Strategy is divided into two parts. Part One provides general information about flooding and flood risk whereas Part Two focuses on the more technical details of understanding flood risk in Derbyshire. It includes an action plan detailing how Derbyshire County Council will manage future risks and access funding.</p> <p>Derbyshire County Council's Local Flood Risk Management Strategy should be added to Annex A.</p>	This information has been added to Annex A.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
Environment Agency	<p>Catchment Flood Management Plans (CFMPs) consider all types of inland flooding, from rivers, groundwater, surface water and tidal flooding. CFMPs also include:</p> <ul style="list-style-type: none"> <li>• the likely impacts of climate change;</li> <li>• the effects of how we use and manage the land; and</li> <li>• how areas could be developed to meet our present day needs without compromising the ability of future generations to meet their own needs.</li> </ul> <p>CFMPs help the Environment Agency and their partners to plan and agree the most effective way to manage flood risk in the future.</p> <p>Derbyshire Dales District Council falls within the Peaks and Moorlands sub area of the River Trent CFMP. For the Peaks and Moorlands, the preferred policy is to take action with others to store water or manage run-off in locations that provide overall flood risk reduction or environmental benefits. In particular, to reduce the number of people at risk from deep and fast flowing waters or fast onset of flooding which affects the towns of Matlock and Ashbourne in Derbyshire Dales.</p> <p>This information should be added to Annex A.</p>	This information has been added to Annex A.
Environment Agency	It is noted that the General Quality Assessment (GQA) way of measuring river quality, which looked at the chemical and biological quality of rivers, has been applied in Annex B. Please note that the GQA method has been superseded by the Water Framework Directive.	Annex A has been amended to reflect this information.
Environment Agency	Under the Water Framework Directive, water quality assessments use a new, tougher methodology which focuses on the ecological health of waters. Up to 37 measures of water quality are used to assess the ecological status of water bodies. These are then classed as high / good / moderate or poor.	Annex A has been amended to reflect this information.
Environment Agency	Information on the ecological status of water bodies in Derbyshire Dales will be available from the second cycle Humber River Basin Management Plan which is due to be published by December 2015. In advance of this publication, the Catchment Summary for the Derbyshire Derwent and Dove may be useful.	See below for action taken.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
Environment Agency	Derbyshire Dales includes larger settlements at high risk of river flooding (e.g. Matlock and Ashbourne) as well as smaller communities that have been impacted in the recent past by flooding from a variety of sources (e.g. Boylestone). Further information on historic flooding from local sources is available by contacting the Flood Risk Management Team at Derbyshire County Council at <a href="mailto:Flood.Team@derbyshire.gov.uk">Flood.Team@derbyshire.gov.uk</a> This information should be added to Annex B.	Information from the draft Humber River Basin Management Plan (2014) has been used to update the baseline data in Annex B. Updated GIS has been provided to DDDC and incorporated into the SHELAA. This will inform the SA of development site options. It is not considered an efficient use of time to review and set out in detail all localised flooding issues within the SA baseline but this information is will be looked at as part of the site assessments.
Environment Agency	<p>The Derbyshire Dales District Council Strategic Flood Risk Assessment (SFRA) provides an overview of flood risk in the district up until 2008 but now needs updating in order to have regard to more recent flooding information. The Environment Agency will write separately to Derbyshire Dales District Council about this matter.</p> <p>In the absence of an updated SFRA, the Sustainability Appraisal should take account of the following sources of flooding information available for the district:</p> <ul style="list-style-type: none"> <li>• Ashbourne Flood Alleviation Scheme, completed April 2012.</li> <li>• River Derwent &amp; tributaries – Matlock and Belper Strategic Flood Risk Mapping, Capita Symonds, March 2011.</li> <li>• Dale Brook, Tideswell Brook, Bradwell Brook and Peakshole Water, Rapid Response modelling, 2011.</li> <li>• Preliminary Flood Risk Assessment for Derbyshire, Derbyshire County Council, May 2011.</li> <li>• River Wye Strategic Flood Risk Mapping, Halcrow, August 2010.</li> <li>• Henmore Brook Flood Alleviation Scheme Mapping Study, Halcrow, 2010. Flood Map for Surface Water, 2010 Derbyshire Dales includes larger settlements at high risk of river flooding (e.g. Matlock and Ashbourne) as well as smaller communities that have been impacted in the recent past by flooding from a variety of sources</li> </ul>	As above comment. This information will inform the sites assessment.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	(e.g. Boylestone). Further information on historic flooding from local sources is available by contacting the Flood Risk Management Team at Derbyshire County Council at <a href="mailto:Flood.Team@derbyshire.gov.uk">Flood.Team@derbyshire.gov.uk</a>	
Environment Agency	The Scoping Report has identified the main sustainability issues with the exception of having regard to the Water Framework Directive (WFD).	No action required in addition to actions set out above. Reference to the draft Humber River Basin Management Plan (2014) has been used to update the baseline data in Annex B and reference to the Water Framework Directive has been made in the scoping report, additions to the SA framework Objective 17 and within Annex A
Environment Agency	The Sustainability Appraisal process provides a key mechanism for ensuring that land use planning decisions made in the revised Local Plan will not compromise the ecological health of the water bodies in Derbyshire Dales and, where possible, will make a positive contribution.	No action required.
Environment Agency	Taking account of the WFD in the Sustainability Appraisal will help demonstrate that Derbyshire Dales have had regard to the River Basin Management Plan, as required by Regulation 17 of the The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003.	The WFD will be taken into account in the Sustainability Appraisal.
Environment Agency	In order to correctly identify the potential significant effects of the Local Plan, and therefore the scope of the assessment, the Local Plan needs to be assessed against achieving the WFD objectives as set out in the Humber River Basin Management Plan.	No action required in addition to actions set out above.
Environment Agency	The Environment Agency recommends the following amendments to the key message for Sustainability Appraisal Objective 3 on biodiversity:  <i><u>“Protect, promote, improve and create—enhance biodiversity, including designated sites, priority species, habitats and ecological networks and make provision for their long term management.”</u></i>	SA Objective 3 has been amended to read: “To protect, <u>improve and create and enhance</u> biodiversity, geo-diversity and to support the development of linked green spaces <u>and make provision for their long term management</u> ”

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	<p>In order for the Sustainability Appraisal Objective to have regard to biodiversity associated with non-designated habitats, they advise the following addition:  <u>“Protect, promote, improve and create diverse wildlife habitats and species or make provision for their long term management.”</u></p> <p>They consider that this objective should also contain the following key messages:</p> <ul style="list-style-type: none"> <li>• integrating Ecosystem Services;</li> <li>• valuing and protecting local diversity and local distinctiveness;</li> <li>• creation of new wildlife areas and increasing ranges of protected species;</li> <li>• managing the effects of climate change on biodiversity – adaptation and mitigation; and</li> <li>• steering new development away from sensitive sites.</li> </ul> <p>These additional key messages should have associated decision-making criteria such as:</p> <ul style="list-style-type: none"> <li>• Will it provide opportunities for new habitat creation?</li> <li>• Will it minimise fragmentation of habitats and increase links (green infrastructure) to maximise connectivity between wildlife habitats to help combat climate change?</li> <li>• Will it take into account the potential impacts of climate change on biodiversity?</li> <li>• Will it value and protect local diversity and local distinctiveness?</li> <li>• Will it safeguard individual landscape features such as hedgerows, ponds etc?</li> <li>• Will it maintain and enhance woodland cover and management in appropriate areas?</li> </ul>	<p>Natural capital is included within the framework and this is a similar concept to Ecosystem services and therefore ecosystem services has not been added to the framework.</p> <p>The following have been added to the framework as decision-making criteria to SA Objective 3:</p> <p>“Will it maintain and enhance woodland cover and management in appropriate areas?”</p> <p>“Will it provide opportunities for new habitat creation?”</p> <p>“Will it conserve and enhance species diversity and in particular avoid harm <u>and increase the ranges of</u> protected species?”</p> <p>“Will it safeguard individual landscape features such as hedgerows, ponds etc?” has been added as a decision-making criterion to SA Objective 12.</p> <p>A new green infrastructure SA Objective has been created:  <u>“To support the development of linked green spaces and make provision for their long term management”</u></p>

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
		All other suggestions are considered to be adequately covered within the SA Framework.
Environment Agency	<p>The Environment Agency considers that one of the key messages for Sustainability Appraisal Objective 17 on the sustainable management of water resources and minimising the risk of flooding should be to <i>“ensure no deterioration in the ecological status of water bodies in the district and achievement of Water Framework Directive objectives as set out in the Humber River Basin Management Plan”</i>.</p> <p>Appropriate decision-making criteria for this key message are: <i>“Will development cause deterioration in ecological status?”</i> and <i>“Will development contribute toward achieving WFD objectives?”</i></p>	<p>The following have been added to SA Objective 17:</p> <ul style="list-style-type: none"> <li>• <u>Will it avoid deterioration and enhance the ecological status of water bodies?</u></li> <li>• <u>Will it contribute toward achieving Water Framework Directive objectives as set out in the Humber River Basin Management Plan?</u></li> </ul>
Environment Agency	Request that Sustainable Urban Drainage Systems (SUDS) is replaced with Sustainable Drainage Systems (SuDS) in order to take account of the rural environment.	Framework, report and Annex B have been amended.
Environment Agency	It should be noted that the restriction of surface water run-off to Greenfield rates is a worthwhile ambition but is not a statutory requirement for brownfield development sites.	Report has been amended.
Environment Agency	<p>Policies, plans and programmes which should be added to Annex A from a biodiversity and natural environment perspective:</p> <p><u>International</u></p> <ul style="list-style-type: none"> <li>• <b>European Directive 2001/42/EC (SEA Directive) on the assessment of the effects of certain plans and programmes on the environment</b></li> <li>• <b>European Biodiversity Strategy 1998</b></li> <li>• <b>Bern Convention on Conservation of European Wildlife and Natural Habitats 1979</b></li> </ul> <p><u>National</u></p> <ul style="list-style-type: none"> <li>• <b>Working with the grain of nature: A Biodiversity Strategy for England 2002</b></li> </ul>	The list of documents has been reviewed and several additional documents have been included in Annex A, which are highlighted in <b>bold text</b> . Documents highlighted in <b>bold italicised text</b> have already been reviewed and are referenced elsewhere in the Scoping Report. All other documents are either not considered to be directly relevant or have been superseded by other, more recent, documents.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	<ul style="list-style-type: none"> <li>• Working with the grain of nature: Taking it Forward: Volume 1, Full report on progress under the England Biodiversity Strategy 2002 – 2006, DEFRA</li> <li>• <b>Wildlife &amp; Countryside Act 1981 (as amended)</b></li> <li>• <b>National Planning Practice Guidance 2014 – Natural Environment</b></li> <li>• <b>Securing the Future : delivering UK sustainable development strategy (2005)</b></li> <li>• <b>Countryside and Rights of Way Act 2000 (CRoW Act)</b></li> <li>• <b>Ancient Monuments and Archaeological Areas Act 1979</b></li> <li>• <b>Catchment Abstraction Management Strategies</b></li> <li>• <b>The Natural Environment White Paper (2011)</b></li> <li>• <b>England Biodiversity Strategy Climate Change Adaptation principles conserving biodiversity in a changing climate (DEFRA 2007)</b></li> <li>• <b>National Environmental &amp; Rural Communities Act 2006 (NERC)</b></li> <li>• The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)</li> <li>• <b>Accessible Natural Green Space Standards in Towns and Cities: A review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)</b></li> <li>• <b>Keepers of Time – A statement of Policy for England’s Ancient &amp; Native Woodlands: action plan 2005-07 (Forestry Commission)</b></li> <li>• Green Infrastructure and the Urban Fringe: learning lessons from the Countryside In and Around Towns Programmes (Natural England NE33)</li> <li>• England’s Terrestrial Ecosystem Services and the Rationale for an Ecosystem Approach</li> <li>• The Ecosystem Concept and the Identification of Ecosystem Goods and Services in the English Policy Context – A Review Paper</li> <li>• Inventory Study on Natural Environmental Data 2 – NR0106</li> </ul> <p><u>Regional / County</u></p>	

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	<ul style="list-style-type: none"> <li>• Derbyshire Dales Landscape Character Plan</li> <li>• <b>Natural Character Areas (50 – Derbyshire Peak Fringe and Lower Derwent, 52 – White Peak and 68 – Needwood and South Derbyshire Claylands</b></li> <li>• <b>Any Landscape Character Assessments</b></li> <li>• <b>Humber River Basin Management Plan</b></li> </ul> <p><u>Local</u></p> <ul style="list-style-type: none"> <li>• <b>Derbyshire Wildlife Trust Strategic Plan 2015-2020</b></li> <li>• Derbyshire Local Wildlife Sites Selection Guidelines 2003 (revised 2011)</li> <li>• <b>SSSI Condition Surveys and Citations</b></li> <li>• <b>SAC Documentation – Site Improvement Plans (SIPs)</b></li> <li>• West Derbyshire and High Peak Greenway Strategy October 2008</li> <li>• <b>Derbyshire Wildlife Trust Living Landscapes Strategy</b></li> <li>• <b>Derbyshire Wildlife DerwentWISE Strategy</b></li> </ul>	
Historic England	Historic England considers that additional information and analysis in relation to cultural heritage is required in order that all relevant plans and programmes of significance to the Derbyshire Dales Local Plan and sustainability are included.	See actions below.
Historic England	<p>Table 11 in Appendix 2 should include the following key documents of relevance to Derbyshire Dales:</p> <ul style="list-style-type: none"> <li>• UNESCO World Heritage Convention 1972,</li> <li>• Planning (Listed Building and Conservation Areas) Act 1990,</li> <li>• Ancient Monuments and Archaeological Areas Act 1979,</li> <li>• <b>Historic England Good Practice Advice Notes 1-3 (N.B Good Practice Advice Note 3 has replaced the 2011 Setting document as referenced in the table. This should be amended),</b></li> <li>• <b>Derwent Valley Mills World Heritage Site Management Plan,</b></li> <li>• Conservation Area Character Appraisals and Management Plans.</li> </ul> <p>The Good Practice Advice Notes can be accessed via the following links:</p> <ul style="list-style-type: none"> <li>• <a href="http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/">http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/</a></li> </ul>	<p>The list of documents has been reviewed and several additional documents have been included in Annex A, highlighted in <b>bold text</b>, as they are considered to be of direct relevance to the SA and provide useful information and objectives.</p> <p>At this strategic level, it is not considered appropriate to review all of the conservation area character appraisals and management plans. These will be relevant at the planning application level.</p>

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
	<ul style="list-style-type: none"> <li>• <a href="http://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/">http://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/</a></li> <li>• <a href="http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></li> </ul>	
Historic England	It is felt that the baseline presents a comprehensive background into the designated heritage assets of the Plan area.	No action required.
Historic England	No reference is given to non-designated heritage assets. These are recognised and afforded protection in the NPPF and make an important contribution to the character of the area. This is therefore an omission which should be rectified.	Annex B and the main scoping report have been amended to add this detail.
Historic England	The section on listed buildings should be vastly improved. Derbyshire Dales has the greatest number of listed buildings in the whole of the East Midlands and as such it is important to reflect this. Information on numbers of assets listed at grade I, II* and II would be helpful, as well as highlighting some of the key asset or asset groups.	Annex B and the main scoping report have been amended to add this detail.
Historic England	The summary of Townscape Quality, Historic and Cultural Heritage provided in the main report (4.12) is extremely brief, and fails to pick up on the pertinent facts. No reference to heritage at risk, for example, is made here.	Section 4 of the scoping report has been amended to expand the key issues in line with the full baseline in Annex B.
Historic England	In general, with regard to cultural heritage, the potential significant effects are identified.	No action required
Historic England	The analysis presented in Annexe B regarding the further protection which can be afforded via DM policies is welcomed.	No action required
Historic England	Overall Historic England are content with the objective however suggest the addition of a further decision making criteria of "Will it tackle heritage-at-risk?"	The Local Plan will have limited influence on tackling heritage-at-risk at a strategic level, however, planning policies and development control could help address this issue. Therefore, the existing decision-making criterion which supports the SA Objective 14 has been amended as follows: "Will it preserve or enhance heritage assets (including heritage-at-risk) and their settings?"

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
Historic England	<p>Overall, it is considered that some amendments are required to the SA framework to ensure that it meets the requirements of the Directive and Legislation in relation to cultural heritage.</p> <p>The changes suggested above will ensure compliance in this respect. Historic England are happy to provide further advise on these as appropriate.</p>	See amendments recommended above.
Natural England	Natural England generally welcomes the SA Scoping report for the Derbyshire Dales Local Plan and considers that the methodology used appears to meet the requirements of the SEA Directive (2001/42/EC) and associated guidance.	No action required
Natural England	<p>Natural England are pleased to note the report has made a number of references to Green Infrastructure (GI) however it is suggested that GI could also be mentioned under the health &amp; well-being and climate change sections as well as the biodiversity &amp; green infrastructure section. This would assist in ensuring that GI is an integral, cross-cutting theme throughout the assessment and demonstrate an ecosystems approach with regard to the provision of GI.</p> <p>Good quality local accessible green space, ecosystems and actions to manage them sustainably offer a range of benefits, including the following:</p> <ul style="list-style-type: none"> <li>• Space and habitat for wildlife with access to nature for people</li> <li>• Places for outdoor relaxation and play</li> <li>• Climate change adaptation - for example flood alleviation and cooling urban heat islands</li> <li>• Environmental education</li> <li>• Local food production - in allotments, gardens and through agriculture</li> <li>• Improved health and well-being – lowering stress levels and providing opportunities for exercise.</li> </ul>	<p>'Will it prevent the fragmentation of habitats?' has been added to SA Objective 3 in SA framework as a decision-making criterion.</p> <p>'Will it help to provide accessible green space or green infrastructure?' has been added to the SA Objective 4 (relating to GI) in the SA framework as a decision-aiding criterion.</p> <p>Climate change adaptation has been added to a new SA Objective on green infrastructure.</p>
Natural England	Natural England are pleased to see that adaptation measures to ensure areas of fauna and flora, are resilient to future changes in climate has been included in the section on climate change.	No action required

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
Natural England	Range of references set out in Annex A: Review of Relevant Policies, Plan and Programmes is comprehensive. Would suggest however that there could be additional reference to Green Infrastructure (GI) at a county or local level for example the 6C's Green Infrastructure Strategy or if there is a specific study of the GI of the Derbyshire Dales.	Annex B has been amended to reflect this document.
Natural England	<p>Whilst the reference to the Derbyshire Landscape Character Assessment is welcomed it is suggested that the relevant National Character Areas (NCAs) are also referenced. NCAs divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. The NCAs that fall within Derbyshire Dales District are as follows:</p> <p>NCA 50: Derbyshire Peak Fringe &amp; Lower Derwent            NCA 52: White Peak            NCA 64: Potteries &amp; Churnet Valley            NCA 68: Needwood &amp; Derbyshire Claylands</p> <p>For further information on NCAs please see the gov.uk website as follows:  <a href="https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-east-midlands">https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-east-midlands</a></p>	Annex B has been amended.
Natural England	In Chapter 10: Landscape and Natural Resources it is noted that reference is made to the Countryside Character publication- this has now been replaced by the information contained within the National Character Area (NCAs) profiles as discussed above.	Annex B has been amended.
Natural England	The detailed sustainability framework is welcomed and it is considered to generally cover Natural England's interest in the natural environment. Would suggest that under sustainability objective 3, regarding biodiversity and geodiversity, that it would be helpful to include an additional decision making criteria which would cover the prevention of the fragmentation of habitats and the need to encourage ecological networks.	' <u>Will it prevent the fragmentation of habitats?</u> ' has been added to SA Objective 3 in the SA framework as a decision-making criterion.

<b>Table A.1: Consultation Responses to Derbyshire Dales District Council SA Scoping Report Consultation 2015</b>		
<b>Organisation</b>	<b>Comment</b>	<b>Response/Recommendation</b>
Natural England	Suggest that under objective 9 an additional decision making criteria regarding the provision of accessible green space or green infrastructure which will contribute to the health and well-being of local residents could be included.	<u>'Will it help to provide accessible green space or green infrastructure?'</u> has been added to the SA Objective 4 in the SA framework as a decision-aiding criterion.

Draft SA Report (May 2016)

The Draft SA Report received a total 42 comments from three statutory consultees (Historic England, Natural England and the Environment Agency) as well as First City the Property Consultancy. A summary of the comments received, and the action taken are listed Table A.2.

<b>Table A.2: Consultation Response to Derbyshire Dales District Council Draft Sustainability Report May 2016</b>		
<b>Consultation Body</b>	<b>Issues Raised</b>	<b>Summary of Action Taken</b>
<b>Historic England</b>	The UNESCO World Heritage Convention 1972 is particularly relevant since part of the Derwent Valley Mills WHS lies within the plan area.	Document was reviewed and added to PPP review.
	Clarification is needed for HC2(e) (SHLAA 233 Land to North of A52, Brailsford), as it is not clear how the cumulative impact of the housing allocation site on the Conservation Area and wider landscape has been considered.	Reviewed assessment to ensure that this site was considered.
<b>Environment Agency</b>	Update the Humber River Basin Management Plan with the latest second cycle plan	Document was reviewed and added to PPP review and baseline as appropriate
	To include the Humber Flood Risk Management Plan (FRMP)	Document was reviewed and added to PPP review and baseline as appropriate
	Amend wording of Policy DS1	Included in Pre-submission Draft Plan Policy DS1, bullet point 16 to read "An ecological assessment (i.e. desk and field based assessments, habitats/species assessments/migration proposals)" Also bullet point 18 to read: "Development shall have regard to the need to ensure sufficient capacity in the local sewage network and sewage treatment works."
	Amend wording of Policy DS3	Included in Pre-submission Draft Plan Policy DS3 bullet point 11 to read "Ecological assessment (i.e. desk and field based assessments, habitats/species assessments/migration proposals)." Also bullet point 13 to read: "Development shall have regard to the need to ensure sufficient capacity in the local sewage network and sewage treatment works."

<b>Table A.2: Consultation Response to Derbyshire Dales District Council Draft Sustainability Report May 2016</b>		
<b>Consultation Body</b>	<b>Issues Raised</b>	<b>Summary of Action Taken</b>
		Bullet points 4 &5 and the application of Policies PD6: Trees, Hedgerows and Woodlands is considered to address the final point raised.
	Amend wording of Policy DS4	Included in Pre-submission Draft Plan Policy DS4 bullet point 1 to read "Preparation of a comprehensive Masterplan for the development which provides for no built development (except essential flood risk and highway infrastructure) on the upper northern slopes beyond the extent of the Derwent Valley Aqueduct on the Western side of the site (west of the existing Reservoir). Bullet point 9 to read "A site specific flood risk assessment in accordance with the findings of the Derbyshire Dales Strategic Flood Risk Assessment and focuses on the other courses of flooding (including surface water and groundwater). Development shall have regard to the need to ensure sufficient capacity in the local sewage network and receiving sewerage treatment works. Bullet point 11 to read "Ecological assessment (i.e. desk and field based assessments, habitats/species assessments/migration proposals)"
	Amend wording of Policy DS5	Included in Pre-submission Draft Plan Policy DS5 bullet point 14 to read "Ecological assessment (i.e. desk and field based assessments, habitats/species assessments/migration proposals)". Bullet point 12 to read "Development shall have regard to the need to ensure sufficient capacity in the local sewage network and receiving sewage treatment works."
	Amend policy DS6 and DS7 to accord with policies PD3 and PD4 and ensure that mitigation is required and a net increase in biodiversity sought.	Included in Pre-submission Draft Plan Policy DS6 bullet point 15 to read "Ecological assessment (i.e. desk and field based assessments, habitats/species assessments/migration proposals)". Bullet point 12 to read "A Site specific hydrogeological assessment into the potential impacts of the development and mitigation measures required to ensure the ongoing protection of groundwater in the underlying Source Protection Zone 1 of a public water supply."

<b>Consultation Body</b>	<b>Issues Raised</b>	<b>Summary of Action Taken</b>
		<p>The Local Plan is read as a whole and in considering the development of this site the District Council will need to be satisfied that it complies with Policies PD3 &amp; PD4.</p> <p>The Local Plan is read as a whole and in considering the development of this site the District Council will need to be satisfied that it complies with Policies PD3 &amp; PD4.</p> <p>Included in Pre-submission Draft Plan Policy DS7 bullet point 13 to read "Site specific hydrogeological assessment into the potential impacts of the development and mitigation measures required to ensure the ongoing protection of groundwater in the underlying Source Protection Zone 1 of a public water supply."</p> <p>Bullet point 15 to read "Ecological assessment (i.e. desk and field based assessments, habitats/species assessments/migration proposals)".</p>
	Due to possible capacity issues at Ashbourne Sewage Treatment Works it is advised that DDDC continues their engagement with the utility provider, in order to prevent deterioration in the environment as required by the WFD.	Liaison with Severn Trent Water is an ongoing process. Included in Pre-submission Draft Plan Policy DS8 bullet point 11 to read "An Ecological assessment (i.e. desk and field based assessments, habitats/species assessments/migration proposals)".
	There are possible capacity issues at Matlock, Brailsford and Ashbourne Sewage treatment works (WWTWs) that will require further investigation.	Part 2 of the SA Report has been amended to reflect this issue.
	Policy HC2 (a) needs to take into account the high nature conservation value of the site. Loss to development could not be mitigated, and a compensatory habitat is likely to be required in agreement with Derbyshire Wildlife Trust.	Planning applications for housing development on allocated sites will be subject to assessment with all policies in the Local Plan including PD3. It is considered that PD3 as drafted in the pre-submission draft addresses this point raised.
<b>Natural England</b>	DS3 Stancliffe Quarries: Natural England expressed concern for of the impact that this development may have on the setting of the Peak District National Park. A Landscape & Visual Impact Assessment would be required.	Included in Pre-submission Draft Plan Policy DS3, bullet point 11.

<b>Table A.2: Consultation Response to Derbyshire Dales District Council Draft Sustainability Report May 2016</b>		
<b>Consultation Body</b>	<b>Issues Raised</b>	<b>Summary of Action Taken</b>
<b>First City the Property Consultancy</b>	It is advised that the Council carry out an assessment of all 'strategic scale' proposals at Wirksworth as a larger scale of development is now proposed at this settlement.	DDDC has amended the site boundary and development capacity accordingly.

Pre-Submission SA Report (August 2016)

The Pre-Submission SA Report received a total of 11 comments from Historic England, Tansley Parish Council, Gladman Developments Ltd and one member of the public. Of these comments two required further action. These comments and the relevant action taken, have been broken down in the table below.

<b>Table A.3: Consultation Response to Derbyshire Dales District Council Sustainability Report August 2016</b>		
<b>Consultation Body</b>	<b>Issues Raised</b>	<b>Summary of Action Taken</b>
<b>Tansley Parish Council</b>	The Sustainability Appraisal Part 3 Table 4.7 makes no mention of Tansley	Revise Assessment: The site allocations at Tansley have all been assessed individually in the SA.
	The cumulative impact of additional traffic generated by Tansley House Gardens and Whitelea will be significant upon Church Street, bearing in mind the 'pinch point' when entering the street can only accommodate one car, there is not room for two vehicles to pass.	Revise Assessment: The Highways Authority have been consulted on the allocation sites and have not identified any traffic issues in relation to each site on its own. The traffic resulting from the allocation sites will need to be considered at the planning application stage through transport assessments.
	Tansley is 2.5 kms from all day to day services to include food shopping and GP services, there is no explanation of how this SA has informed the inclusion of sites in Tansley. Bearing in mind its lack of sustainability.	Revise Assessment: For all of the sites, a minor negative effect has been identified in relation to SA objective 16 relating to sustainable transport access) due to the lack of retail and a GP surgery in the village.
<b>Anthony Lewis</b>	This appraisal is incorrect in a number places. These errors mean that some allocations are not the most appropriate, when considered against the reasonable alternatives.	Revise baseline / PPP review: Site SHLAA350 failed stage B of the SHELAA and therefore was considered not to be a reasonable alternative. The appeal information could be used to update the SA Report, Part 2 Annex A. The SA Report, Part 3, Annex A has been updated to remove reference to the original unsuccessful planning application.
	The site shown in red has been allowed on appeal, rather than refused as stated in the report.	
	Highway constraints are not so severe as to prevent small-scale development, as demonstrated by the appeal decision.	
	The appeal decision does not consider it to be an area of high landscape sensitivity, and the Council have taken an inconsistent view, compared to 3 other sites, in interpreting the Landscape Sensitivity Study.	

Inspector's Modifications (July 2017)

The SA Report was updated and consulted on alongside the Inspector’s Modifications following examination in May 2017. A response was received from one consultee in relation to the SA. Table A.4 documents the comments made. No action was required.

<b>Table A.4: Consultation Response to Derbyshire Dales District Council Sustainability Report July 2017</b>		
<b>Consultation Body</b>	<b>Issues Raised</b>	<b>Summary of Action Taken</b>
<b>Gladmans</b>	<p>Contrary to the Planning Practice Guidance, the site selection process has been based on a Sustainability Appraisal that has failed to assess all reasonable alternatives to the same level of detail as the selected option.</p> <p>Gladman continue to have concerns that the Sustainability Appraisal that has been prepared by the Council to justify the proposed housing allocations has mistakenly screened out a number of reasonable alternative sites through the SHELAA process. Specifically, the process has screened out sites from appraisal in circumstances where the issues identified can be appropriately addressed or mitigated through the planning process. Indeed, at the Matter 1 Hearing Session, it is was confirmed by the Council that those issues that have been red rated through the SHELAA process can be overcome and that those sites could be brought forward in the future. As a result, Gladman consider that the approach within the SA is flawed because it goes against the Planning Practice Guidance<sup>10</sup> (PPG) whereby:</p> <p>“The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach)”</p>	<p>No change. The SA has followed a robust and transparent approach to identify reasonable site options. The approach is detailed within the SA Report, Part 3, Annex A and the reasons that some site options have not been chosen are detailed within the same Annex document. All reasonable site options have been assessed to the same level of detail as the preferred options.</p>

## Appendix B – Identifying Reasonable Site Options

### Introduction

This appendix sets out the findings of the Strategic Housing and Economic Land Availability Assessment (SHELAA) which identified sites considered to be reasonable options for allocation within the Local Plan.

Options for site allocations were identified through a ‘call for sites’ exercise undertaken at the end of 2015 and additional sites were identified through consultation on the Derbyshire Dales Draft Plan in April/May 2016.

The remainder of this appendix explains the SHELAA process. The SHELAA followed a two staged assessment process using a database.

### Filtering Site Options

#### SHELAA Stage A: Site Suitability – Strategic Constraints

This stage discounted sites in locations that were wholly unsuitable for housing development. This ensured time was not wasted on analysing sites in more detail that have no realistic housing potential. Stage A investigated the strategic constraints of the site, which are a filter for the minimum requirements for the site to be considered suitable. The following criteria were used to assess the first stage of a sites suitability:

<b>Table B.1: SHELAA Stage A Criteria</b>	
<b>Criteria</b>	<b>Justification</b>
Sites entirely within Flood Zone 3 (Zone 3a or 3b)	As set out in the NPPF (paragraph 100) inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at highest risk.
Site entirely within Special Areas of Conservation, Special Protection Areas, RAMSAR sites or SSSI	National Policy advises against development that would have an adverse impact on nationally or internationally important conservation interests.
Sites in unsuitable areas, unsustainable locations, e.g. open countryside. In order to quantify and identify whether a location is deemed sustainable, the following criteria has been applied: <i>“The site is related to the settlement of XXX, and the substantially built up area of the settlement”.</i>	Development in unsustainable locations unrelated to existing settlements may not contribute towards the creation of sustainable communities.
Site size threshold	NPPG guidance recommends a threshold of site and locations of 5 dwellings or economic development on 0.25ha/500m <sup>2</sup> floor space be used for housing and economic land availability assessments. The District Council has decided to filter out sites that fall below 5 dwellings or with a site area less than 0.2ha for residential

<b>Table B.1: SHELAA Stage A Criteria</b>	
<b>Criteria</b>	<b>Justification</b>
	development or sites for economic development with a site area less than 0.25ha/500m <sup>2</sup> floor space.

If sites were deemed to fail criteria within Stage A then the site was discounted from further assessment. All remaining sites were tested against Stage B, which considered other possible constraints, as well as the availability and developability of sites.

#### SHELAA Stage B: Detailed Assessment of Development Potential and Suitability

This stage assessed the sites in more detail to determine development potential and suitability. Assessment criteria and corresponding shading (red/amber/green) for Stage B are provided in Table B.2. The SHELAA was informed by information provided by relevant Council officers and consultees including Derbyshire County Council (with regards to highways and archaeology) and the Derbyshire Wildlife Trust and Environment Agency.

Following completion of the SHELAA Stage B assessment, value judgements were made regarding whether sites had passed or failed Stage B. Sites failed Stage B of the assessment for the one or more of following reasons:

- *Site not suitable* – based on the outcome of the SHELAA the site is subject to significant constraints that cannot be overcome. For example, significant highway constraints – a safe and secure access cannot be achieved; significant adverse impacts on natural environment assets such as landscape, historic environment or biodiversity which are unlikely to be possible to mitigate, as information by consultees including the County Highways Authority, Council Officers and the Derbyshire Wildlife Trust.
- *Site not available* - sites were assessed to determine whether they are available for development. A site is considered available for development, when there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips or operational requirements of landowners (para 3-020-20140306 NPPG).
- *Site not achievable* – sites were assessed to determine if there would be a reasonable prospect that housing will be developed on the site at a particular point of time and included a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period.

Sites which passed Stage B of the SHELAA were considered to be reasonable alternatives and were subjected to SA. Sites which failed the SHELAA were considered not to be reasonable site allocation options and the reasons they have

failed are set out within the SA Report, Part 3, Annex A (Table A.3). Sites which are not considered to be reasonable alternatives were not subjected to SA.

<b>Table B.2: SHELAA Stage B Assessment Criteria - Detailed Assessment of Development Potential and Suitability</b>				
<b>Criteria</b>	<b>Issue</b>	<b>Red</b> (Site does not satisfy criteria)	<b>Amber</b> (Criteria may be capable of being satisfied)	<b>Green</b> (Criteria are satisfied)
<i>Flood Risk</i>	<i>Is the site within a functional floodplain and/or subject to or at risk of flooding?</i>	The majority of the site is within flood zone 2 or 3 and not suitable for development.	Parts of the site are affected by flood zone 2 and/or have significant surface water flood risk and further investigation is required (an application of policy tests).	The site is not affected by identified areas of indicative flood mapping or is located in flood zone 1.
<i>Environment and Ecology, including local biodiversity Input from Derbyshire Wildlife Trust/ Natural England</i>	<i>What is the impact upon any further important site(s) or habitats e.g. local wildlife site?</i>	There are significant adverse impacts in terms of the natural environment that cannot be mitigated against	Although there are some identified adverse impacts in terms of the natural environment, there is the possibility of mitigation	There are no known natural environment related constraints and/or there is the opportunity to enhance the natural environment
<i>Landscape</i>	<i>What would be the impact of development on landscape character and visual amenity?</i>	Significant impact upon landscape character. High landscape sensitivity. Unable to overcome through mitigation	High to medium landscape sensitivity, Opportunities to mitigate impacts and for further enhancement	Low landscape sensitivity and no adverse impact upon landscape setting. Opportunities for improvement and enhancement.
<i>Historic Environment</i>	<i>Would there be a potential impact on any aspect of the historic environment in terms of its significance, character and/or setting relating to any designated heritage assets (i.e. listed buildings, scheduled monuments; registered park &amp; gardens, world</i>	Development of the site is likely to result in harmful impact to/on the significance/setting of a listed building (I, II*, II); a scheduled monument; a registered park or garden (I, II*, II); world heritage site and its buffer zone; a conservation area; a non-	Development of the site may result in harmful impact to/on the significance/setting of a listed building (I, II*, II); a scheduled monument; a registered park or garden (I, II*, II); world heritage site & its buffer zone, a conservation area; a non-	Development of the site is likely to result in minimal or no impact to/on the significance/setting of a listed building (I, II*, II); a scheduled monument; a registered park or garden (I, II*, II); world heritage site & its buffer zone, a conservation area; a non-designated heritage asset. It

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	<i>heritage site &amp; its buffer zone, and conservation areas) and any non-designated heritage assets?</i>	designated heritage asset. It is unlikely that impact can be mitigated.	designated heritage asset. It is likely that impact can be avoided/mitigated.	is likely that no mitigation is required.
<i>Trees and Hedgerows</i>	<i>What would the impact be upon any trees or hedgerows, including TPOs? Are there any TPOs or is a large proportion of the site covered by in trees?</i>	There is considerable tree cover across the site and/or there are a large number of group TPOs that would restrict development. No opportunities for mitigation/enhancement	Although there are trees on the site and/or some of them have TPOs on them, this would not hinder development. Mitigation may be achieved.	There are limited trees on the site and none are designated as a TPO. Opportunities for improvement and enhancement.
<i>National Park</i>	<i>Extent to which the site would provide enhancement to, or would be detrimental to the purposes of the National Park</i>	Development would be detrimental to the purposes of the National Park	Site may have impacts on the purposes of the National Park however these impacts may be overcome/mitigated.	Site will have no impact on the purposes of the National Park and presents opportunities for enhancement
<i>Contamination issues</i>	<i>Is there any potential land contamination or unstable land issues on site?</i>	Site deemed at high risk of contamination and instability. Unsuitable for development.	The site is potentially contaminated or unstable and requires further investigation and remediation	There are no known contamination or unstable land issues, or risks of the need for remediation.

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<i>Topography</i>	<i>Are there any topographical constraints on the site? Could the topography constrain development site?</i>	The topography of the site is critical and would have a significant adverse impact and cannot be mitigated	The topography would have an adverse impact, although it could be mitigated and the site developed	Site is predominantly flat with no known topography constraints
<i>Local Character</i>	<i>How would the site impact on the existing character of the settlement?</i>	There would be significant adverse impact on the local character which cannot be mitigated	There would be an adverse impact on the existing character of the settlement, however this could be mitigated	There is either the opportunity to enhance the local character or there is no adverse impact
<i>Highway Infrastructure</i>	<i>Can adequate access be provided to/from a highway? Is there sufficient access to the site?</i>	There are significant issues with access. No safe access can be achieved, significant impact on highway network, insurmountable issues	Safe access can be achieved with localised highway improvements. Significant impacts on highway network can be mitigated in part	There is sufficient access to the site. No adverse impact on the highway network.
<i>Access to Public Transport</i>	<i>What access does the site offer to public transport? How far is the nearest bus stop?</i>	No bus stops within 20 minute walk (i.e. over 1600m)	Within 10-20 minute walk of a bus stop (i.e. 800-1600m)	Within 5-10 minute walk of a bus stop (i.e. less than 800m)
<i>Access to Services and Facilities – Access to educational facilities</i>	<i>What access does the site offer to services and facilities:</i>	Over 20 minute walk (i.e. over 1600m)	10-20 minute walk (i.e. 800-1600m)	Less than 10 minute walk (i.e. less than 800m)

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	<i>How far is the nearest primary school?</i>			
<i>Access to retail facilities</i>	<i>What access does the site offer to services and facilities:  How far is the nearest shop or post office?</i>	Over 20 minute walk (i.e. over 1600m)	10-20 minute walk (i.e. 800-1600m)	Less than 10 minute walk (i.e. less than 800m)
<i>Access to health facilities</i>	<i>What access does the site offer to services and facilities:  How far is the nearest GP surgery or health centre?</i>	Over 20 minute walk (i.e. over 1600m)	10-20 minute walk (i.e. 800-1600m)	Less than 10 minute walk (i.e. less than 800m)
<i>Pedestrian and cycling accessibility</i>	<i>Is there pedestrian and cycle access to the site or could this be provided?</i>	Very limited pedestrian and cycle links e.g. up a lane no pavements	Limited accessibility e.g. pavement, edge of settlement. Opportunities for improvement and enhancement	Safe walking and cycling access links and opportunities for enhancement
<i>Previously Developed Land (site %)</i>	<i>Is the site previously developed or greenfield?</i>	Site predominantly greenfield more than 70%	Site mixed brownfield/greenfield	Site predominantly brownfield, more than 70%
<i>Open Space/ Recreational facilities</i>	<i>Would development of the site result in the loss of open space /recreational facilities? Could replacement provision be</i>	Open space or recreation facilities would be lost	There would be some loss of open space or recreation facilities.	There would be no loss of recreation or open space facilities

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	<i>accommodated? Would development of the site result in the loss of open space or recreation facilities?</i>			
<i>Material considerations including policy development plan designations</i>	<i>Are there any material considerations or development plan designations that may impact the suitability of the site for development</i>	Site seriously conflicts with a material policy consideration or plan designation	Site has a neutral impact on material policy considerations and designations	Site is in accordance with material policy considerations and designations
<i>Infrastructure Capacity/ Utilities</i>	<i>Is the site adequately served by existing infrastructure e.g. utilities and highways or can it be adequately served? If not what improvements would be required?</i>	There are significant infrastructure constraints, for example, strategic infrastructure is required. Major capacity constrains/cost issues.	There are infrastructure constraints, however, they can be overcome through developer contributions. Moderate capacity constraints	There is sufficient infrastructure in place to serve the development. No capacity constraints
<i>Bad Neighbour Impact</i>	<i>Would development for residential use be compatible with existing or proposed surrounding uses?</i>	Unacceptable high adverse effect for occupiers, insurmountable issues	Moderate adverse effect for occupiers, constraints may be overcome by design/mitigation	No known constraints, amenity unaffected
<i>Other Issues</i>	<i>Is there anything else that could impact on the suitability of the site to deliver housing</i>	There are other issues that would constrain	There are other issues that would constrain	There are no other issues that would constrain development

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	<i>development? Are there any other constraints that could impact on potential development</i>	development and are unlikely to be overcome	development however mitigation is possible	
<i>Land Availability</i>	<i>Who owns the land?</i>	Site ownership unknown or Owner unwilling to sell	Multiple ownership, with some issues but generally prohibitive.	Landownership known, single ownership, no issues.