



03rd September 2021

Consultation Response for and on behalf of CPRE Derbyshire

CHE/21/00549/OUT | Outline planning application all matters reserved except for access for up to 500 dwellings, local centre (Class E use and Sui Generis: hot food takeaway and public house/restaurant uses) approx. 4HA), land reserved for a 1 FE primary school (approx. 1HA), drainage, infrastructure, two primary vehicular accesses into the site to serve the residential development from Dunston Road and Dunston Lane via the Skylarks res.devpt, together with assoc. provision of landscaping, public open space, walking and cycling links and the reinstatement of the former cricket pitch and assoc. facilities with vehicular access from Dunston Road | Land Off Dunston Road Chesterfield Derbyshire S41 9RL

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CPRE Derbyshire formally **objects** to the proposed development.

CPRE Derbyshire acknowledges that the site the subject of this outline planning application is an allocated site in Chesterfield Borough Council's Local Plan which was adopted in July 2020, however this does not eliminate the serious concerns that we have about the proposal. The inclusion of the site in the Local Plan was regrettable, in our view, owing to its high landscape value and open countryside character. Development on this site would suburbanise a large tract of open land.

Policy SS6 of the Local Plan for Land at Dunston states:

“Planning permission will be granted for residential development for approximately 500 dwellings on land north of Dunston and south east of Dunston Road as allocated on the Policies Map and as set out in Table 4 (site reference SS6). Development should be carried out in accordance with a masterplan to be agreed with the Local Planning Authority prior to development that demonstrates:

- i. acceptable access arrangements from Dunston Road and Dunston Lane;*
- ii. appropriate provision for walking and cycling within the site.*
- iii. appropriate transport mitigation to ensure an acceptable impact on the highway network for all users;*
- iv. appropriate mitigation to minimise any adverse impacts to the significance of affected heritage assets, including their settings.*
- v. provision of a new local centre to serve development; vi. provision of a site reserved for a new one form entry primary school (to be retained until such time as required or evidence can be provided of a lack of need);*
- vii. a scheme of green infrastructure including landscaping, open space, play and sports provision including re-instatement of the former cricket pitch, and early implementation of a landscaping and planting scheme along Dunston Road;*
- viii. a phasing plan for development phases and the provision of infrastructure.”*

CPRE Derbyshire is not satisfied that the application as it stands provides sufficient information to be assessed against these criteria, even in its form of an outline application. There is a need for more technical information to be supplied.

Our main areas of concern are:

1. The surrounding road network is often narrow and winding and an increase of a further 500 homes will cause unsustainable pressure on existing roads. Though outside the greenbelt, the site is close to its boundary and it may be only too easy to encroach on to the greenbelt in the future. Chesterfield Borough Council's Local Plan at paragraph 11.34 notes that “The area is sensitive in terms of landscape. The ridge line at the north west boundary is particularly sensitive.” In our view, the proposed landscaping plans put forward by the applicant are significantly lacking and do not in any way mitigate against the substantial harm that this development would cause. An abundance of trees and hedging will be

lost during the construction process and the application does not satisfactorily demonstrate how the proposal would achieve a net biodiversity gain as required by the National Planning Policy Framework (NPPF) 2021 (Paragraph 174 (d)). Furthermore, loss of the agricultural land encompassed within the application site will lower crop yield and food production which is not sustainable if agricultural land continues to be urbanised in this manner. We would remind the Council of their pledge to build on brownfield sites where possible.

2. We would remind the Council of the zero-carbon target ambition of the government. Chesterfield Borough Council has also signed the Nottingham Declaration on Climate Change which pledges to address the causes of climate change and prepare for the associated impacts. Furthermore, the Council also declared a Climate Emergency in July 2019. There is limited information provided as to how this proposal would lend itself towards helping the Borough Council address the issue of a changing climate which is one of, if not the biggest issue facing us at the current time. Paragraph 153 of the NPPF 2021 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

Paragraph 154 goes on to state:

“New development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”*

Paragraph 155:

“To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and.*

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers."

The application does not demonstrate any of this. The Council's Climate Change Officer raises a number of important points and we completely endorse their comments, particularly in regard to renewables, EV charging points, house insulation, sustainable drainage, waste management and replacement rates for tree felling.

3. The proposed location of the Local Centre, to the northeast of the application site, is not in a sustainable location and would not encourage users to walk and cycle to the local centre. The location of the Local Centre as proposed would not meet the needs of the development and would actively encourage car dependency.
4. Policy CLP14 of the Local Plan states that: "*all developments will be required to have an acceptable impact on the amenity of users and adjoining occupiers, taking into account noise and disturbance, dust, odour, air quality, traffic, outlook, overlooking, shading (daylight and sunlight and glare and other environmental impacts.*"
No measures have been proposed to explain how this would be managed.
5. Further to point 4., particular concern is raised in regard to highways and traffic issues. Reference is made to traffic calming measures but no further details are provided. We would like to draw particular attention to the surrounding road network. Dunston Road is subject of 7.5 tonne weight restriction and 50mph speed restriction, however this narrow road is frequented by HGV's. There is no pedestrian footway on this road, and it has been subject of many road traffic collisions. Although there have, fortunately, been no fatalities so far, it should not take fatalities occurring before something is done. This proposed development will see a significant increase in traffic using Dunston Road, far and above the numbers quoted in the planning statement and the road simply is not wide enough to cope, especially due to its winding nature. Furthermore, the village of Cutthorpe will undoubtedly see a further increase in traffic levels and this village already experiences issues by virtue of being a rat-run through to the Peak District National Park. Due to the character of the area, roads are often used by large and slow-moving agricultural vehicles. Alongside this, the area is enjoyed by cyclists, joggers, walking groups and horse riders. The development will have a knock-on effect, particularly for pedestrians for whom no consideration has been given in this application.
6. Since the construction of development at the neighbouring Dunston Road site (LPA references: CHE/16/00016/OUT, CHE/17/00351/REM and CHE/18/00805/REM), incidences of flooding have been reported, notably on Dunston Rd at the Sheepbridge junction. The NPPF 2021 notes the following in regard to planning and flooding:

159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

160. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

Although the site is located in Flood Zone 1, CPRE Derbyshire trusts that the Local Planning Authority will take note of the recent flood reports and the requirement of the NPPF that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property (Paragraph 161), particularly in regard to the risk of surface water flooding from Ochre Dyke.

7. How will the Council ensure that the developer would meet their requirements on affordable housing contribution? Section 106 agreements are all well and good until the developer comes in with a variation request stating that it is no longer viable to provide affordable housing. How can this be prevented from happening on this site if the proposal goes ahead?
8. Point 1.17 in the Chesterfield Local Plan requires that "*opportunities for anti-social behaviour in new developments are minimised, especially in the hot spots of Chesterfield Town Centre, Dunston, Moor and St Helens Ward, and Holmebrook and Rother Ward, paying attention to the Chesterfield Community Safety Partnership and Safer Neighbourhoods Team Local Priorities.*"
No information has been provided as to how this would be achieved.
9. The LVIA submitted by the developer is inadequate. From reading, it is clear that the focus is based entirely on 'viewpoints', rather than the landscape character itself, implying that simply by planting screening then there would be no impact on the landscape character. Essentially, the development on this site will fundamentally alter its character and therefore impact on the surrounding area in terms of traffic, tranquillity, light pollution, loss of wildlife and general rural ambience.
10. The number of new dwellings proposed is excessive and would not result in a sustainable form of development as advocated by the NPPF 2021.

CPRE Derbyshire would also like to draw attention to some errors in the application form, namely:

- At question 6 - it states that the existing use is 'agricultural land ' however, the site area includes unmanaged grassland/ meadow, wooded areas, and scrub/unmanaged hedgerows etc. The area is definitely not just 'agricultural land'.
- Question 11 – the applicants have stated that the development will not cause increased risk of flooding elsewhere. We would disagree with this assumption as since the building of the current new houses, incidence of flooding onto Dunston Road at the Sheepbridge junction have increased. Due to the topography of the area, there would be increased run-off towards the newly built houses at the bottom of the hill to the east of the application site which would give rise to increased flooding. The Environment Agency and Lead Local Flood Authority should be heavily involved to ensure that this cannot occur.
- Question 12 – the applicant states that there are NO trees and hedgerows adjacent to the site. This is incorrect. There are trees and hedgerows that border the site and these play a significant role in the landscape character of the area and provide some protection to the green belt which borders the site. A comprehensive green infrastructure and landscaping scheme should be prepared and adhered to in order to mitigate against the harm this development will cause to the green belt.

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Personal Best Planning for and on behalf of CPRE Derbyshire

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