

Proposal: Outline planning permission with some matters reserved, for an alternative form of restoration and redevelopment of Crich quarry for a mixed-use leisure development on approximately 43 acres of land.

Location: Crich Quarry, Town End, Crich, Matlock, DE4 5DP

DCC reference CM6/0122/28

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

CPRE Derbyshire believes that the proposal is contrary to local and national planning policy.

CRICH PARISH NEIGHBOURHOOD DEVELOPMENT PLAN

The Neighbourhood Development Plan is the most recent part of local planning policy, having been “made” in September 2018. The Council is reminded that Section 3 of the Neighbourhood Planning Act requires that, as part of the Development Plan, the Neighbourhood Plan must be given full weight in the determination of planning applications and in decisions on planning appeals in the plan area.

Further, Section 156 of the Housing and Planning Act (2016) requires any conflict with a neighbourhood plan to be set out in the committee report, that will inform any planning committee decision, where that report recommends granting planning permission for development that conflicts with a made neighbourhood plan.

NATIONAL PLANNING POLICY FRAMEWORK

Paragraph 12 of the National Planning Policy Framework (NPPF) (2021) states:

“Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted”

CPRE Derbyshire observes that the submitted Planning Statement on behalf of the applicant does not address any of the key policies of the Development Plan contained within the Crich Parish Neighbourhood Development Plan.

Similarly, the submitted Design and Access Statement fails to show any consideration for the policies of the Neighbourhood Plan.

CPRE Derbyshire would like to make the following observations.

CRICH PARISH NEIGHBOURHOOD DEVELOPMENT PLAN POLICIES (2018)

POLICY NP1: SPATIAL STRATEGY

The proposal is in direct conflict with the spatial strategy for the following reasons:

1. The proposal is located outside of the settlement development boundaries;
2. The density of development of the proposal is inappropriate and does not harmonise with the surrounding environment;
3. The proposal fails to conserve or enhance the landscape character and setting of Crich and the immediate area;
4. The proposed development does not prevent the risk of damage to areas of importance for nature conservation.

POLICY NP2: DEVELOPMENT WITHIN SETTLEMENT DEVELOPMENT BOUNDARIES

Land outside the settlement development boundary should be treated as open countryside which is to be protected for the sake of its intrinsic character and beauty in accordance with paragraph 174 of the NPPF which states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

CPRE Derbyshire considers that the application fails to contribute and enhance the natural and local environment as a result of failing to provide sufficient information to allow the application to be comprehensively assessed against this criteria.

POLICY NP3: PROTECTING THE LANDSCAPE CHARACTER OF CRICH PARISH

CPRE Derbyshire strongly feels that the proposal will have a significant adverse impact on publicly accessible views, views that have been identified as being particularly important in the “*Crich Parish: Villages in a Landscape - Appraisal and Policy Guidance*” document, therefore the proposal fails to comply with Policy NP3.

It is noted that the applicant is making much of the fact that the current disused quarry is a blot on the landscape, and arguing that the proposed development would improve what is currently having an adverse impact. CPRE Derbyshire strongly disagrees to this conclusion. Although the disused quarry is visible in the landscape, it does not create an eyesore in the way the developer is implying and is not particularly impactful on the far-reaching views from many points across the landscape, from where Crich Stand is a prominent feature. The quarry is testament to the mining history that the area and the Peak District in general is famous for. The proposed development would actually be far more impactful and have a significant adverse impact by introducing a built environment with all the attendant noise and light pollution. The scar created by the disused quarry could be modified by rewilding and tree planting, but will not be modified by this sort of development. CPRE Derbyshire would welcome the opportunity to discuss with relevant third parties an appropriate way forward for this site.

Furthermore, the proposal offers no assessment of the geological value of the application site which is in direct conflict with part a) of Paragraph 174 of the NPPF (cited above)

POLICY NP8: LOCAL GREEN SPACES

CPRE Derbyshire considers that the proposal will have an hostile impact on the openness and special character of the Crich Stand Local Green Space. This was designated due to its local significance and its exceptional association to the local and wider communities. Historic England have stated that the proposed development is:

“highly incongruous and inappropriate in a rural landscape that forms an important aspect of the immediate setting of Crich Stand and the wider setting of the Derwent Valley Mills World Heritage Site.”

CPRE Derbyshire concur fully with this conclusion. The application offers no clear and convincing justification for the scale of development proposed or the potential harm to the significance of heritage assets that would be likely to result, or for the need to excavate a considerable amount of additional land in order to accommodate the scheme. The Council is reminded that this is required by Paragraph 200 of the NPPF:

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

CPRE Derbyshire consider that any public benefits of the proposal would not outweigh the significant harm created. Crich Stand is a place of remembrance and quiet reflection, honouring those lives lost in conflict. Crich Stand is an important heritage asset dominating the surrounding countryside and adjacent Derwent Valley Mills World Heritage Site. The proposed development is within the immediate setting of Crich Stand and will adversely affect the significance of the Grade II* designated heritage asset through visual intrusion, noise and

light pollution (further comments on this will follow further in our response). The proposal fails to comply with this policy.

POLICY NP9: MAINTAINING AND ENHANCING THE PARISH'S BIODIVERSITY

The proposal will irreversibly harm a range of ecological features and habitats on the site. The submitted Environment Statement fails to provide a full and thorough assessment of the important ecological features and habitats that will be impacted. Notwithstanding this, it is considered that any mitigation efforts would not outweigh the significant harm that the proposed development would result in, therefore the development would conflict with this policy.

POLICY NP10: CONSERVATION AND ENHANCEMENT OF NON-VEHICULAR ROUTES

The proposal will adversely impact the charm of statutory active non-vehicular routes, notably the popular public footpath that links Crich Stand and Wakebridge, due to visual intrusion, noise and disturbance, therefore does not comply with the aims of Policy NP10.

POLICY NP17: CAR PARKING

The Neighbourhood Plan identifies at Paragraphs 248 and 249:

"248. The only major road serving the Crich Parish area is the A6 to the extreme west which provides useful links to the A38 and M1 and subsequent connections to other parts of the region and the country. Other important roads in its network include B5053 to other locations and there are several other minor roads. Traffic flow increases during the summer months and many weekends throughout the year, as coaches and other motor vehicles pass through the village visiting Crich Tramway Village home of the National Tramway Museum.

249. Crich Village Centre can become particularly congested during periods of peak travel..."

This suggests that traffic flow is already at saturation point in Crich and any additional development will only serve to exacerbate this issue, let alone a development the size of what is proposed with this planning application. The submitted Transport Assessment fails to offer any realistic traffic management measures, including provision of parking locations which is in conflict with Policy NP17.

Crich is a small village with village infrastructure. Crich and the surrounding area does not lend itself to accommodate a development the scale of what is being proposed as part of this application. The applicant's conclusion in the submitted Transport Assessment that *"no road safety interventions are necessary"* is, with all due respect, fundamentally wrong and inadequate. Paragraph 111 of the NPPF reads:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

The supporting information submitted by the applicant in the form of a Transport Assessment and a Report on Parking Strategy fails to demonstrate how the severe cumulative impacts on

the road network could be overcome. CPRE Derbyshire share the valid concerns raised by local residents in regard to highway safety impacts.

NOISE AND LIGHT POLLUTION

The proposed outdoor activities would result in significant noise and light pollution unbecoming of the rural village location and of which it would be unrealistic to mitigate against.

The noise and light that would emanate from the proposal would have an extremely harmful impact on the tranquil nature of the immediate setting of the memorial tower.

CONCLUSION

CPRE Derbyshire **strongly object** to this planning application for the reasons outlined above. The proposal fails to comply with local and national planning policies and no mitigation measures are possible that could outweigh the significant harm that would be caused by this proposed development.

CPRE Derbyshire request that Derbyshire County Council keep us fully informed of all future developments and updates with this site.

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For and on behalf of CPRE Derbyshire