



HEATH & HOLMEWOOD PARISH COUNCIL

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Dear Graeme,

Ref: 24/00473/MFL - Erection of residential dwellings with associated means of access, landscaping and associated works (Major Development), Land East Of Central Street, Holmewood

I am writing to make you aware of the strong objections that the Parish Council and the wider community have regarding the above unacceptable proposal.

In preparing this response we have consulted extensively with local parishioners and others including at a well-attended public meeting.

The planning application wishes to develop a major housing development on a greenfield site in the countryside, in an unsuitable and unsustainable location that it not allocated for development.

The proposal is not without merit, there would be some benefits, notably through the provision of affordable housing. It is not considered these, by a wide margin, would outweigh the harm it would cause, especially as it would cause significant damage to the character, appearance, amenity and infrastructure (including roads and community) of the surrounding area. In addition, it is contrary to national and local planning policies.

It is simply not a suitable or a sustainable location for this type of development.

For these and other important reasons, it should be refused.

Turning to the main reasons why we consider it should be refused in more detail.

Contrary to North East Derbyshire Local Plan policies

Planning rules require that planning applications are to be determined in accordance with the development plan unless material considerations indicate otherwise.

The development plan for the area is the approved North East Derbyshire Local Plan 2014-2034 ('the Local Plan').

The main policy dealing with the spatial strategy and the distribution of development is SS2: Spatial Strategy and the Distribution of Development. This policy sets out a strategy to promote prosperous and sustainable communities by delivering new development and provide housing based on the findings of the Settlement Hierarchy

Study, which analyses the roles that different settlements perform for their communities.

Criteria 7c of this policies states that policies for settlements will...*“Maintain the role of settlements by supporting their ability to sustain services and facilities through new development that is appropriate in scale and reflects their position in the Settlement Hierarchy”*.

Also of relevance in the consideration of this planning application is Criteria 8, which states that *“Land which lies outside a Settlement Development Limit and is not allocated for development, will be treated as ‘countryside’ where development will only be permitted in accordance with Policies SS1 (Sustainable Development) and SS9 (Development in the Countryside)”*.

The site lies outside the approved Settlement Development Limit for Holmewood. As such it is the countryside for planning purposes. A fact that is not disputed by all parties.

Holmewood is not one of the main towns listed in Policy SS2. It is with several other communities in the district a Level 2 Settlement (Large Village).

Within Holmewood, the Local Plan has a housing target of 484 new homes; a target which has already been met through completions between 2014 and 2020 (193) and allocations with planning permission (291). As such, this site and no further ‘windfall’ sites are required for Holmewood.

Indeed, the applicant does not argue that the site is required to meet housing needs. Rather that the proposed development is a rural exception site under Policy LC3: Exception Sites for Affordable Housing.

We strongly refute that the site should be viewed as a rural exception site.

Policy LC3 concerns the provision of affordable housing in the countryside. It recognises that there may be some special circumstances, where planning permission may be granted for affordable housing on sites in the countryside which would not be normally allowed. It contains several criteria which have to be satisfied for development on an exception site to be permitted.

We contend that the proposal does not meet these criteria. In particular:

Clause a requires that *“They would provide affordable housing which would meet a proven need which is supported by an up to date local housing needs survey”*.

We dispute the accuracy, methodology and findings of the local housing needs survey provided as part of the planning application.

If this is intended to provide the robust evidence base to demonstrate proven need, it fails to do so. In particular, it is based on a less than a 8% response rate to the associated household survey (*“1,580 questionnaires were dispatched and 122 were returned, para 4.5*). This is a figure which most would consider to be unacceptable for this type of survey.

Further, the responses received are skewed to certain groups. A good example is the number of residents who live in rented privately accommodation. At the time of 2021 Census 14.7% of residents in the Parish lived in such accommodation; however, only 5 or 4.4% of respondents to the survey lived in this type of accommodation. A weakness the study acknowledges stating at para 4.8 "*The under-representation of private tenants is of concern*".

There are also issues with the methodology, including the absence of follow-up questionnaires and lack of qualitative analysis for example interviews with key stakeholders such as the Parish Council and indeed North East Derbyshire District Council.

Moreover, there may be the potential for new affordable housing to come forward in Holmewood due to the major housing developments in the pipeline in the Parish, including the sites allocated in the Local Plan and associated affordable housing requirements. The likelihood of any forthcoming affordable housing in the parish meeting the needs identified in the flawed report appears to have been disregarded.

The poor response rate and flaws in the methodology means that its findings are inaccurate and unreliable and should be disregarded.

Clause b requires that "*It can be demonstrated that there are no suitable alternative development locations within the Settlement Development Limit*"

It is incumbent on the applicant to demonstrate that there are no possible suitable alternatives to the application site within the Holmewood Settlement Development Limit. We contend that the evidence has failed to do this in a meaningful manner. As such, it has not been demonstrated that there are no suitable alternative development options within the built-up part of the village as required by the policy.

Clause d. requires that "*They have a close association with the built up part of settlements within level 1 to 3 or neighbouring authority areas; and are in keeping with the form, size and character of the settlement, and local landscape setting*"

While it is acknowledged that exception sites, by their very nature, are likely to involve development on greenfield land adjacent to a settlement, so they will involve some intrusion into the countryside. However, in this case, the development would not be well-related to the built form of the village and would result in significant harm to its character and setting.

The site is in a prominent location, in the countryside and outside the approved Settlement Development Limit. Its open and undeveloped character is highly valued and prized by the local community. This is for a variety of reasons. These include that it is important for the character and setting of the village, the opportunities it provides for informal recreation, visual beauty, nature conservation and the views it offers to the wider rural landscape.

The development with its introduction of domestic buildings, parking etc, would result in significant and permanent harm to the landscape, character and local distinctiveness. It represents unacceptable urban encroachment into a prominent, open and attractive countryside, rather than as a natural extension to the village. This

would result in a completely negative change in the character of the landscape and certainly cannot be considered to be in keeping with the form, size and character of the settlement, and local landscape setting as required by the Local Plan.

Negative Impact on Highway and Pedestrian Safety

The proposed development would present a serious and unacceptable road safety issue.

The main access to the site would be via Central Street and the surrounding roads. Roads which are not designed or suitable for the type and amount of traffic that uses them; many are narrow, for example. These roads are already busy and traffic jams are common at peak times. Furthermore, in many locations the footpaths running along the road are very narrow, making it hazardous when walking, especially for the elderly and for parents with young children.

The proposed development will only make this unacceptable situation worse to the detriment of highway and pedestrian safety.

Unacceptable Adverse Impact on Services

Holmewood already has limited facilities and services, many of which are already struggling to cope with demand, especially given that permission has already been granted for approximately 1000 new homes in the village and the surrounding area and more approvals are in the pipeline. There is insufficient capacity in key services such as schools and health services.

This is recognised in the Local Plan that identifies Holmewood as a Level 2 Settlement, where local services and facilities are limited.

While the proposal includes some measures to improve the provision of some local services and facilities, these are inadequate to meet the anticipated local demand of the development.

As such it would have an unacceptable impact and cause harm on the physical and social local infrastructure, especially due to insufficient capacity in schools, health and drainage capacity and facilities.

It does not represent Sustainable Development

The Local Plan seeks to direct development to the most sustainable locations within the district, namely sites within the main towns and development sites. While it is accepted that the site is on the edge of a village, this does negate the fact that it is in the countryside. By their nature, sites in the countryside are less sustainable due to developments in such locations often exacerbating car reliance and putting new homes in locations that are not well-served by existing physical and social infrastructure. As is the case here.

Furthermore, public transport provision to the site is, at best, very limited. It is served by an infrequent bus service which connects it with the nearby centres such as Chesterfield. However, the bus service to the site is poor and does not reliably run beyond 1800 hours or on a Sunday. It does not, therefore, provide a viable alternative

mode of transport, especially taking into account the limited range of services and facilities to satisfy day-to-day needs that the village has to offer. Access to key services from the site would, therefore, be overwhelmingly by car, which is contrary to national and local planning policies.

Can we stress that the Parish Council is not opposed to development. Far from it. Heath and Holmewood has already experienced significant house building in recent years with more in the pipeline. It is considered that the village has already made its proportional and sustainable contribution to meeting housing supply. Indeed, it has already met its housing requirement as set out in the Local Plan. There are already concerns about the adverse cumulative impact these developments will have on the character, sustainability and services in the village. The proposal is too much.

While we recognise the need for more appropriate affordable housing, this should not come at the expense of the character, appearance and the well-being of the area. It is also contrary to local planning policies and may create a precedent for similar development across the district. The proposed development is not in a suitable location nor does it represent sustainable development.

A view shared by many others. From reading the consultation responses it is clear the proposed development does not have the support of the local community, this including ward members, local residents as well as the Parish Council.

For these and other compelling reasons, we strongly urge that the application be refused.

Yours sincerely,



Mrs Karen Howe

Clerk to Heath & Holmewood Parish Council