Ref:

(For office use only)

**REPRESENTATION FORM**

**NORTH EAST DERBYSHIRE LOCAL PLAN**

**PUBLICATION DRAFT**

**General Information**

This stage of the consultation is focussed on whether the Publication Draft version of the Local Plan is legally compliant and sound, rather than the wider ranging questions that we have asked in previous consultations on the Local Plan.

* The deadline for representations is 5pm on Wednesday 4 April 2018. Late representations will not be accepted.
* Be clear about which policy, paragraph or Map of the Local Plan you are responding to.
* Be clear whether you are supporting or objecting to the Local plan. If you think the Local plan is not **legal** or **sound**, be clear why. Please refer to the Guidance Note for more details.
* Try to support you representation(s) with evidence.
* Be clear about any changes you want to see.
* Briefly and precisely cover all information and evidence to support or justify your representation(s). Once the consultation closes there is unlikely to be a further opportunity to provide further information or evidence.
* The Council has also published supporting documents to accompany the Publication Draft Local Plan. They are the Sustainability Appraisal, Policies Map and Consultation Statement and are available to view on the Council’s website, and at deposit venues (the Council Offices on Mill Lane and libraries throughout the District). A range of evidence base studies that underpin the policies within the Plan are also available to view on the Council’s website.

If you wish to make comments on this Plan you may fill in this form. Additional copies of the form are available on line at [www.ne-derbyshire.gov.uk/localplan](http://www.ne-derbyshire.gov.uk/localplan) and can be submitted by e-mail to local.plan@ne-derbyshire.gov.uk. Or by post to:

**Planning Policy Team,**

**North East Derbyshire District Council,**

**2013 Mill Lane, Wingerworth,**

**Chesterfield, Derbyshire,**

**S42 6NG**

**All comments must be received by 5pm**

**on Wednesday 4 April 2018**

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| **Submitting your representation online**Submitting your representation online is a quicker way of getting involved.* You will receive an instant confirmation email to give you a receipt so that you know your representation has been successfully delivered and that your comments will be considered.
* Go to <https://bolsover.jdi-consult.net/localplan/> for more information.

*(If you don’t yet have an account, you can set one up easily from this web address)* |

**Filling in the form**

* **PLEASE READ THE GUIDANCE NOTE BEFORE COMPLETING THIS FORM**
* **Your comments are classed as formal representations on the Local Plan.**
* **This form has two parts:**

**Part A: Personal and contact details**

**Part B: Your Representations**

* **Please fill in a separate sheet for each representation you wish to make**

Only the content of your representation and your name will be available for public inspection, and will be published online and in public reports and documents.

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| **PART A – PERSONAL AND CONTACT DETAILS** |

|  |  |  |
| --- | --- | --- |
| **Personal Details**  |  | **Agents Details (if applicable)** |
|  |  |  |
| Rep ID (if known from previous |  |  |
| consultations) |  |  |
| Title | Mr. |  |
|  |  |  |
| First Name  | Paul |  |
|  |  |  |
| Last Name | Johnson |  |
|  |  |  |
| Job Title  |  |  |
| (where relevant) |  |  |
| Organisation  |  |  |
| (where relevant) |  |  |
| Address Line 1 | Rose Cottage |  |
|  |  |  |
| Line 2 | 1 Spinkhill Road, |  |
|  |  |  |
| Line 3 | Killamarsh, |  |
|  |  |  |
| Line 4 | Derbyshire |  |
|  |  |  |
| Post Code | S21 1EH |  |
|  |  |  |
| Telephone Number | 0114-248-2929 |  |
|  |  |  |
| E-mail Address | pjassociatespaul@aol.com |  |

If you do not complete this section, your comments cannot be registered or considered as part of the process.

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| **PART B – YOUR REPRESENTATION** |

Please use a separate form for each representation/ point you wish to raise and firmly attach these to part A which contains your contact details.

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| **Question 1** (See page 3 of the Guidance Note) |

To which part of the Local Plan does your representation relate?

(Please quote paragraph or policy reference)

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| Chapter 2 – Affordable Housing (LC2), paragraphs 2.15 and 2.16 and provision of local employment. |

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| **Question 2** (See page 3 of the Guidance Note) |

Do you wish to state your support or objection to this part of the Local Plan?

|  |  |
| --- | --- |
| SUPPORT | ☐ |
| OBJECT | X☐ |

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| **Question 3** (See page 3 of the Guidance Note) |

Please enter your representation here. This should explain why you either support this part of the Local Plan or why you think the Local Plan is or is not legally compliant or sound (see guidance note for an explanation of legally compliant and sound). Please be as precise as possible (in no more than 100 words).

If your representation requires more than 100 words, please attach any additional sheets securely to this form and use the box below to summarise your representation.

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| The affordable housing need, and the employment requirement, impinge upon the total number of houses planned for the period of the Plan. The number of affordable homes required has been calculated (guessed?) at between 494 dwellings p.a. in the 2012 draft version to 172 (without enhancement) in 2018, yet the total number of dwellings required in the District has remained constant at 6,600.The two main, saved, employment sites in Killamarsh are either, virtually at expansion capacity, incapable of expansion despite capacity, or unpopular. Aspinall Verdi scored the main Killamarsh site (Norwood) at a very low 13, compared to the high-scoring Markham Vale and Biwaters.**Additional comments. Affordable Housing Need (LC2)**The requirement for affordable homes within the District has varied wildly throughout the protracted term of the Plan’s submission.* 2012 consultation version – requirement 494 affordable homes p.a.
* 2015 consultation version – requirement 381 affordable homes p.a.
* 2018 publication version – requirement 172 affordable homes p.a., enhanced by demographic requirement to 248, with 10% added, presumably for ‘good luck’, giving a total of 273 affordable homes p.a.

Whilst accepting that situations change over time it does appear that there is a declining trend, which makes the enhancement of the affordable homes ‘need’ figure aspirational, without good evidence.Research by the National Trust has shown that some 330,000 building plots, each with planning permission, have not been developed, mostly by the ‘big’ builders.Research carried out by NEDDC shows between 2006 and 2011 there was a growing proportion of larger houses built, with a significant decline in 1 or 2 bedroom properties. Equally disturbing are the figures which show that, between 2002 and 2011, only 9.5% of the properties built were in the affordable category – this in an era when the requirements was 40%. As I understand from previous evidence documents then need is for one, two and three bedroomed homes, not especially four or five bedroom ones. However, larger properties enhance the profitability for developers and are, therefore, popular with them. I have not seen any more up-to-date figures ***Whilst I agree that the District Council should have the provision of affordable housing as a priority it should be to provide a ‘reasonable’ number of affordable units in ‘appropriate’ places, for ‘local’ need. This should exclude Green Belt areas.***This view is supported by a comment, reported in a national newspaper, by a spokesperson for the Department of Communities and Local Government. ***When commenting about the NPPF she said, “This will put power back in the hands of local people, ensuring they are in charge of deciding the areas they wish to see developed and those to be protected, including green spaces of value to the community”.*** This Plan takes no account of this.***Killamarsh Residents Against Greenbelt Erosion (RAGE) has a petition with more than 1,100 signatures of local residents strongly opposed to the development of Green Belt sites surrounding Killamarsh. The signatories to this petition, and many others not yet mobilised, will form a significant opposition group in the prevention of building on Killamarsh Green Belt land.*****Paragraph 2.15** relates to the alleged link between affordability and home owning, apparently necessitating the building of more homes in the north.It is worth pointing out that home values have fallen in real terms by 22% in the Killamarsh West ward and by 12% in Killamarsh East, according to the BBC Business News report on the 17th October, 2017. **Paragraph 2.16** espouses the ‘*need to provide employment locally in order to provide the opportunity for people to work close to where they live.’*The two employment sites specified for Killamarsh are located at the Westthorpe Business Centre and the Norwood Industrial Estate. Westthorpe has capacity for one more unit only on a site of .35 of a hectare. The last time I saw figures for this complex it was operating at about 50% of capacity.The Norwood site has proved unpopular with developers, according to the District’s environmental scan. This is, no doubt, because of its proximity to the former sites of Yorkshire Tar Distillers, Lee Environmental and, currently Veolia, in view of the significant and dangerous contamination known to have emanated from those sites.This is reinforced by the assessment of the site, during a study entitled, ‘NE Derbyshire Employment Sites’, by Aspinall Verdi, which concluded that Norwood (and Callywhite Lane at Dronfield) each scored 13 – the lowest of the sites studied. In contrast, Markham Vale and Biwaters/Clay Cross scored 25 and 23 respectively. Housing should be built where most employment opportunities arise, thereby minimising the need to commute.The scoring parameters outlined encompass strategic communications, proximity to the labour market, local services, adjoining uses, development constraints and attractiveness to occupiers.**How does this lack of options for employment equate with the regeneration aspiration and the building of homes for local employment use.** |

If you have stated your support for this part of the Local Plan, please move to Question 5. If you have stated your objection for this part of the Local Plan, please move to Question 4.

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| **Question 4** (See page 3 of the Guidance Note) |

If you are objecting to this part of the Local Plan, please let us know what changes you think are needed to make the Local Plan legally compliant and / or sound (see guidance note for an explanation of legally compliant and sound).

You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible (in no more than 100 words)

If your representation requires more than 100 words, please attach any additional sheets securely to this form and use the box below to summarise your representation.

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| Amend the total number of houses required for the district, which have been based on unrealistic employment opportunity figures, and accept that any dwellings built in Killamarsh will only be occupied by people working outside the district, thus making the development unsustainable in terms of additional traffic and greenhouse gas emissions. Remove the two main sites in Killamarsh because, in these circumstances, it is unnecessary to use Green Belt land. The argument about affordability does not apply in Killamarsh West, where 330 houses are planned, because house prices have fallen by 22%, in real terms. The argument that under-supply means high, unaffordable prices, is apparently invalid. |

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| **Question 5** (See page 4 of the Guidance Note) |

Do you consider that the Local Plan is legally compliant?

|  |  |
| --- | --- |
| YES | ☐ |
| NO | X☐ |

If you have stated no, please make sure this links back to your response in Questions 3 and 4 (the meaning of ‘legally compliat’ is explained in the guidance note).

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| **Question 6** (See page 5 of the Guidance Note) |

Do you consider Local Plan is sound?

|  |  |
| --- | --- |
| YES | ☐ |
| NO | X☐ |

If you have stated no, please make sure this links back to your response in Questions 3 and 4 and let us know which of the ‘tests of soundness’ it has failed (Questions 6A – 6D below).

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| **Question 6A** (See page 5 of the Guidance Note) |

Do you consider that the Local Plan is unsound because it is not ‘positively prepared’?

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 6B** (See page 6 of the Guidance Note) |

Do you consider that the Local Plan is unsound because it is not ‘justified’?

|  |  |
| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 6C** (See page 6 of the Guidance Note) |

Do you consider that the Local plan is unsound because it is not ‘effective’?

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 6D** (See page 6 of the Guidance Note) |

Do you consider that the Local Plan is unsound because it is not ‘consistent with national policy’?

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 7** (See page 6 of the Guidance Note) |

Do you consider that the Local Plan complies with the Duty to Co-operate?

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| --- | --- |
| YES | ☐ |
| NO | ☐ |

If you have stated no, please make sure this links back to your response in Questions 2 and 3 (remember to look at the requirements in the guidance note).

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| **Question 8** (See page 7 of the Guidance Note) |

If you are objecting to this part of the Local Plan, please let us know if you raised this matter at an earlier stage of the plan making process such as the Consultation Draft Local Plan in February/March 2017.

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

If yes, please move to Question 9. If no, please move to Question 10.

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| **Question 9** (See page 7 of the Guidance Note) |

If you raised this matter at an earlier stage of the plan making process, which stage was it?

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| --- | --- |
| Consultation Draft Local Plan (February-March 2017) | X☐ |
| Initial Draft Local Plan (Part 1) (February-March 2015) | X☐ |
| Local Strategy Consultation (August-September 2012) | X☐ |
| Core Strategy Issues and Options Consultation (April-June 2009) | ☐ |

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| **Question 10** (See page 7 of the Guidance Note) |

If your representation is seeking a change, do you consider it necessary for you to participate at the Hearing Sessions should the Inspector wish to discuss your representation / issue at the Hearing?

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 11** (See page 7 of the Guidance Note) |

If you wish to participate at the Hearing Sessions, please outline why you consider this to be necessary?

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| I am the Chair of a group opposed to development on Green Belt land and I wish to represent the vies of a group of people with similar views. |

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing sessions.

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| **Question 12** (See page 8 of the Guidance Note) |

Would you like to be notified of one or more of the following (please tick the relevant boxes)

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| --- | --- |
| When the Local Plan is submitted for independent examination? | X☐ |
| When the Inspector’s report is published? | X☐ |
| When the Local Plan is adopted? | X☐ |

Please return the completed form by 5pm Wednesday 4 April 2018 to:

By email:

local.plan@ne-derbyshire.gov.uk

By post:

Planning Policy Team

North East Derbyshire District Council

2013 Mill Lane

Wingerworth

Chesterfield

Derbyshire

S42 6NG

If you have any questions, please contact us on 01246 217171/ 7694/ 7169/ 7180

Next Steps

Following the close of consultation we will prepare a summary of the main issues raised by representations. The representations, summary of issues, Local Plan and other supporting documents and evidence base studies will then be submitted to the Independent Inspector for examination in May 2018.

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|  All personal information provided to North East Derbyshire District Council will be held and treated in confidence in accordance with the Data Protection Act 1998. It will only be used for the purpose for which it was given, which is to ensure your representation is recorded, and to contact you regarding your representation. However, the content of your representation including your name and address will be available for public inspection, and will be published online and in public reports and documents. |