

# Response to the Sustainability Assessment

Review of the ‘sustainability assessment’ report for sites PHS165 (Land at Cumberhills Road) and PHS188 (Land to the north of Wirksworth Road)

## **Executive summary:**

The proposals to remove these two sites from the Green Belt are unsound on the basis that the sustainability assessment did not assess all objectives and where objectives were assessed, the underlying data is either incorrect or purely subjective in a number of cases.

This appears to be contradictory to the comments made by the Inspector who previously asked whether “the Sustainability Appraisal has been robustly prepared with a comparative and equal assessment of each reasonable alternative” (Document INS/01). The Inspector also asked that decision-making scoring was “robust, justified and transparent”.

The Inspector asked, “has the Highway Authority accepted that the scale and location of the development in the plan will not cause significant problems?”. This is a fair and reasonable question however there does not appear to be any evidence to answer this other than that captured as part of the pre-submission local plan which does not reflect the addition of the two Duffield sites. A Freedom of Information request has shown that the Highway Authority have significant concerns regarding the Wirksworth Road site due to insufficient sight-lines from the proposed junction.

The Inspector also asked, “has a Heritage Impact Assessment been undertaken? If so, what were the conclusions?”. A review of the examination library does not show any documents that include a reference to a Heritage Impact Assessment for the Duffield sites.

The plan submission can be considered to be unsound on the basis that the Sustainability Assessment falls well short of what could be considered to be complete and lacking sufficient detail and evidence to justify the ratings displayed. A more detailed critique is set out in detail below.

## Sustainability Assessment (based on Table 5.6 in the Addendum to Submission Sustainability Appraisal document)

- For the Cumberhills road site 5 out of 15 of the criteria are unassessed.
- For the Wirksworth road site 3 out of 15 of the criteria are unassessed.

Table 5.6 Sustainability appraisals of proposed allocated development sites within other Settlements

	Biodiversity	Housing	Accessibility	Quality of Life	Inequalities	Economy	Employment	Infrastructure	Sustainable Travel	Town and Village Centres	Resources	Pollution	Climate Change and Flooding	Townscape and Historic Environment	Landscape
The Common, Crich	X	✓✓	✓	?	✓	✓	-	?	✓	--	✓	?	✓	X	XX
Wessington Lane, South Wingfield	✓	✓✓	X	?	✓	✓	--	--	✓	--	X	?	✓	--	X
Land north of Denby	XX	✓✓	✓✓	?	✓	✓✓	✓✓	?	✓	?	X	?	XX	X	XX
Chesterfield Road, Heage	✓	✓	✓✓	?	✓	?	?	?	✓	?	X	?	✓	X	XX
Cumberhills Road, Duffield	✓	✓✓	✓	?	✓	✓	--	?	✓	?	X	?	✓	?	XX
Wirksworth Road, Duffield	✓	✓✓	X	?	✓	✓	--	--	✓	--	✓	?	XX	?	XX

## Site PHS165 (Land at Cumberhills Road)

### S01 – Biodiversity

This is scored as a single 'tick' which according to the criteria means that this will "deliver biodiversity gain". It is not at all clear how removing this site from Green belt to deliver 175 new houses will deliver a biodiversity net gain. There are multiple watercourses, hedgerows and ponds which have not been assessed for biodiversity. The Derbyshire Wildlife Trust in their comments about this site stated that the "site supports priority habitat (native hedgerows) and priority species (Brown Hare and farmland birds)"

### S02 – Housing

Given the track record of development in Duffield, which has seen the construction of large detached properties, the ability to deliver 30% of the site as housing which is affordable for Amber Valley residents is questionable. This is particularly relevant given that house prices in Duffield are typically double that seen in Derby City for a similar property. There has been a reluctance by developers to build affordable housing in Duffield as evidenced by the former council depot site on the A6 in Duffield which was originally scheduled for 38 homes (including 30% affordable housing) and this has now been altered to the site delivering just 15 "prestigious" 4 and 5 bedroom houses.

### S03 – Accessibility

The detailed decision-making criteria for this objective refer to “reasonable walking distances” as the measurement metric. This site has been scored as a single ‘tick’ which suggests that the site is “less than 800m from hourly or better bus service”. As the maps below show, the walking distance to the nearest hourly bus service is 757 metres from the extremity of the site and this is via an unmade footpath which is not part of this land. The small area within the 800m range (see figure 2) is the least likely to be built on assuming defensible boundary mitigations and therefore no housing on the Cumberhills site will be within an 800m walk to the bus stop.

The Cumberhills site is over 1.2km walking distance to the nearest bus stop via the existing roadside footpaths (See Figure 3). There is limited road width toward the village for this to be improved for pedestrian or cycle paths. This is further exacerbated by on-road parking being required for the row of tightly spaced semi-detached houses to the West side of Cumberhills Road.

Using the centroid location of the site, the walking distance to the bus stop is significantly in excess of 800m.

The same measurement errors apply to the walking distance to the train station. The Addendum to Submission Sustainability Appraisal Appendix 3 states that “there is a railway station within 1,200m of the site”. The actual walking distance to the train station at the nearest point to the site is 1,600m and using the centroid of the site, this increases to over 2,000m.

Figure 1: Walking distance to nearest bus stop



Figure 2: Extent of the area of the site within 800m of the bus stop



Figure 3: Alternative route from the site to the nearest bus stop avoiding the unmade footpath



#### S04 – Quality of Life

“Uncertain effect” – this needs to be more fully assessed. The increased volume of traffic and pedestrians must surely lead to an absolute increase in the number of people involved in accidents in the village of Duffield particularly given the narrow footpaths from the site to the village centre and the lack of safe road crossing points.

#### S05 – Inequalities

The detailed decision-making criteria for this objective state, “will it narrow the inequality gap between the richest and poorest in the borough”. Given that Duffield is one of the most expensive villages in which to live in Amber Valley, it is not clear how building more homes in this location would “narrow the inequality gap”.

#### S06 – Economy

It is not at all clear as to why this objective is scored as single “tick” as there are no significant employment opportunities in the village of Duffield. It is therefore not at all clear how the site “will make a minor contribution towards the diversification and growth of the economy”. Stating that the construction of housing would have supply chain benefits is not a valid argument as this only applies to the period during which construction takes place and would not endure beyond the completion of the development.

#### S07 – Employment

This is rated as “no effects identified” which supports the point that development on this site would not “create greater employment opportunities and higher value jobs across the borough”.

#### S08 – Infrastructure

This is rated as having an “Uncertain effect”. Given the critical need for supporting infrastructure, the lack of evidence and assessment of this objective is sufficient in itself to render the proposal unsound. As noted by Derbyshire County Council Highways department, there has been no cumulative assessment on the transport infrastructure of multiple developments taking place. The recent high court decision to allow the construction of 400 houses at Kedleston, along with the expansion of the Radbourne and Mackworth estates need to be modelled in terms of traffic flows into Derby City centre which is the closest major employment centre.

There is also no assessment of the infrastructure required to convey the significant volumes of rainwater safely to the River Derwent given the risks highlighted by the Lead Local Flood Authority regarding surface water flooding from this site affecting properties on Broadway. The current storm drain system was constructed in the 1960’s and evidence provided shows that this is already at capacity. More detailed evidence, including photographs, to show the significant flood risk is covered in more detail as part of this submission.

#### S09 – Sustainable Travel

The sustainability objective is stated as “promote sustainable travel habits” and has been scored as a single “tick” which suggests that the site is within 800m of an hourly or better bus service. As already demonstrated above, the vast majority of this site (over 95%) is not within 800m walking distance of a bus stop.

#### S10 – Town and Village Centres

Given that Duffield is a vibrant village within the Derwent Valley Mills World Heritage Site, it is difficult to understand why this hasn’t been more fully assessed.

#### S11 – Resources

The evidence provided on this objective is at best unclear and bordering on contradictory. In the text below the site assessment for PHS165 (P302 Appendix 3), it states that “the site has the potential to include some best and most versatile land” however there is no clear assessment as to what percentage of the site this definition applies to. The report states that “most of the site is identified as grade 4 land” however there is no quantification of this statement.

#### S12 – Pollution

This has not been assessed yet the addition of 175 homes will almost certainly increase noise levels in the village as well as result in a deterioration in air quality. Further assessment is required to assess and benchmark existing air quality levels and to model the effect of increased housing.

#### S13 – Climate Change and Flooding

Given the comments from the Lead Local Flood Authority regarding surface water flooding, it is difficult to understand why this has been assessed as a single “tick”. The construction of an attenuation pond on this site (required as part of planning permission for Cumberhills Grange development in 2003) highlights the known flood risk and the need to put in place infrastructure to deal with a 1 in 100 year rainfall / flood risk event. Evidence provided as part of this submission has already shown the failure of this facility to handle peak rainfall volumes.

The notes to this sustainability objective state that “all sites of more than 1 hectare will need to be supported by a flood risk assessment which will assess flood risk from all sources and set out mitigation to lessen flood risk”. It is not clear whether this assessment has been completed and that this covers surface water flooding. Clear evidence of surface water flooding is covered elsewhere in this submission which shows the effect of surface water flooding on homes on Broadway.

#### S14 – Townscape and Historic Environment

Despite the historic nature of the village of Duffield and its location within the setting of the Derwent Valley Mills World Heritage Site, it is not clear why this objective has not been assessed

#### S15 – Landscape

The scoring and comments for this objective are correct in that the site scores “xx” which is defined as “site is located in the green belt, within the world heritage site or its buffer, in an area of primary sensitivity as defined in the AMEA work or conservation area”. This is backed up by the comments on P302 of Appendix 3 which states that the site “is identified as being of high landscape sensitivity”

## Site PHS188 (Land to the north of Wirksworth Road)

### S01 – Biodiversity

This is scored as a single 'tick' which according to the criteria means that this will "deliver biodiversity gain". It is not at all clear how removing this site from Green belt to deliver 70 new houses will deliver a biodiversity net gain. There are multiple hedgerows which have not been assessed for biodiversity.

### S02 – Housing

Given the track record of development in Duffield, which has seen the construction of large detached properties, the ability to deliver 30% of the site as housing which is affordable for Amber Valley residents is questionable. This is particularly relevant given that house prices in Duffield are typically double that seen in Derby City for a similar property. There has been a reluctance by developers to build affordable housing in Duffield as evidenced by the former council depot site on the A6 in Duffield which was originally scheduled for 38 homes (including 30% affordable housing) and this has now been altered to the site delivering just 15 "prestigious" 4 and 5 bedroom houses.

### S03 – Accessibility

The detailed decision-making criteria for this objective refer to "reasonable walking distances" as the measurement metric. This site has been scored as a single 'cross' which suggests that the site is "less than 1,200m from hourly or better bus service". As the maps below show, the walking distance to the nearest hourly bus service is more than 1,200 metres from the extremity of the site and this is via an unmade footpath which is not part of this land.

Using the centroid location of the site, the walking distance to the bus stop is significantly in excess of 1,200m.

The same measurement errors apply to the walking distance to the train station which is over 1,200m walking distance from this site.

Figure 4: Walking distance to nearest bus stop



#### S04 – Quality of Life

“Uncertain effect” – this needs to be more fully assessed. The increased volume of traffic and pedestrians must surely lead to an absolute increase in the number of people involved in accidents in the village of Duffield particularly given the narrow footpaths from the site to the village centre and the lack of safe road crossing points.

#### S05 – Inequalities

The detailed decision-making criteria for this objective state, “will it narrow the inequality gap between the richest and poorest in the borough”. Given that Duffield is one of the most expensive villages in which to live in Amber Valley, it is not clear how building more homes in this location would “narrow the inequality gap”.

#### S06 – Economy

It is not at all clear as to why this objective is scored as single “tick” as there are no significant employment opportunities in the village of Duffield. It is therefore not at all clear how the site “will make a minor contribution towards the diversification and growth of the economy”. Stating that the construction of housing would have supply chain benefits is not a valid argument as this only applies to the period during which construction takes place and would not endure beyond the completion of the development.

#### S07 – Employment

This is rated as “no effects identified” which supports the point that development on this site would not “create greater employment opportunities and higher value jobs across the borough”.

#### S08 – Infrastructure

This is rated as “Development can mitigate the likely effects of the plan option or site”. As noted by Derbyshire County Council Highways department, there has been no cumulative assessment on the transport infrastructure of multiple developments taking place. The recent high court decision to allow the construction of 400 houses at Kedleston, along with the expansion of the Radbourne and Mackworth estates need to be modelled in terms of traffic flows into Derby City centre which is the closest major employment centre.

In addition, the Highways department have raised concerns regarding the lack of sufficient sight-lines from the proposed entrance to this development site.

#### S09 – Sustainable Travel

The sustainability objective is stated as “promote sustainable travel habits” and has been scored as a single “tick” which suggests that the site is within 800m of an hourly or better bus service. As already demonstrated above, this site is not within 800m walking distance of a bus stop.

#### S10 – Town and Village Centres

This is rated as “no effect identified”. Given that Duffield is a vibrant village within the Derwent Valley Mills World Heritage Site, it is difficult to understand why this hasn’t been more fully assessed.

#### S11 – Resources

It is not clear on what basis this has been scored as a single “tick”.

#### S12 – Pollution

This has not been assessed yet the addition of 70 homes will almost certainly increase noise levels in the village as well as result in a deterioration in air quality. Further assessment is required to assess and benchmark existing air quality levels and to model the effect of increased housing.

#### S13 – Climate Change and Flooding

This site has been rated as “xx” which means that the “plan option or site development is likely to lead to significantly increased flood risk and is located in an area identified as being at high flood risk and not defended or at high risk from surface water flooding”. On this basis alone, it is not clear why this site has been proposed as a housing growth site in the local plan.

#### S14 – Townscape and Historic Environment

Despite the historic nature of the village of Duffield and its location within the setting of the Derwent Valley Mills World Heritage Site, it is not clear why this objective has not been assessed. This is particularly relevant given the specific comments on page 346 of appendix 3 which states “Development of the site would result in the loss of some of the countryside setting of designated heritage assets. Further information is required to determine the extent and nature of archaeological remains”

#### S15 – Landscape

The scoring and comments for this objective are correct in that the site scores “xx” which is defined as “site is located in the green belt, within the world heritage site or its buffer, in an area of primary sensitivity as defined in the AMEA work or conservation area”. This is backed up by the comments on P302 of Appendix 3 which states that the site “is identified as being of high landscape sensitivity”