

North East Derbyshire Local Plan

**Issues and Options (Regulation 18) Consultation
on Strategic Approach to the Location of
Development and Refined Sites**

HE & ME Rhodes Trust

White Lane Farm, White Lane, Sheffield (Reference 45900)

Professional memberships and accreditations



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1. Introduction

- 1.1. These representations are prepared by Fisher German on behalf of our client the HE & ME Rhodes Trust in respect of their land interests at White Lane Farm, White Lane, Sheffield (NED Reference 45900).
- 1.2. The site was submitted to the Council during the 2025 Call for Sites exercise, owing to its proximity and synergy with proposals which are draft allocated in the emerging Sheffield Local Plan (Policy SA6 - South Sheffield Sub-Area Site Allocations Site Reference: SS19 Address: Land to the south of White Lane, S12 3HS) (Figure 1 below).

Recommended change to Policies Map

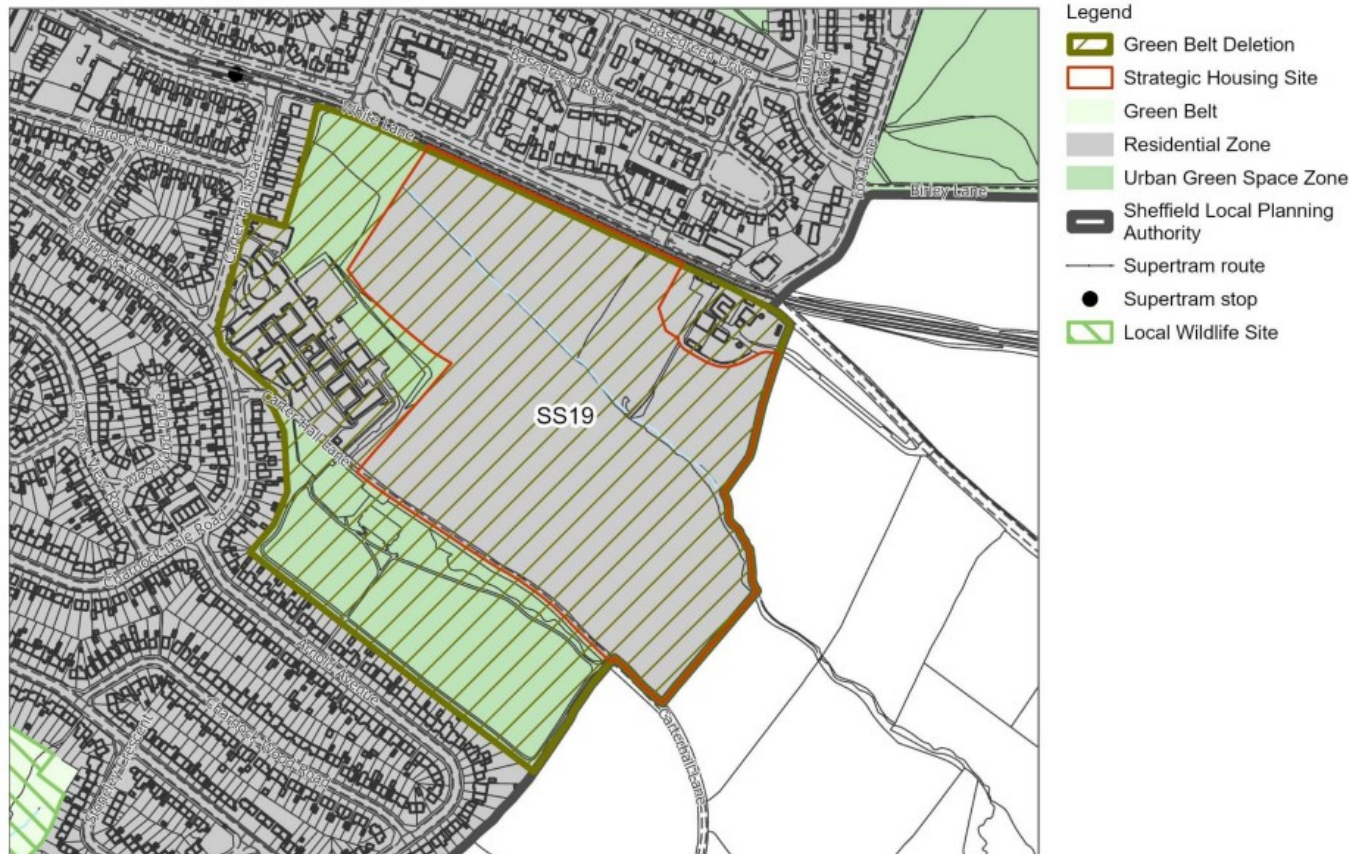


Figure 1: Sheffield Plan, Proposed Additional Site Allocations document (May 2025)

- 1.3. This land is proposed to be allocated for 304 dwellings in the emerging Sheffield Local Plan. Whilst an omission site at the time of submission, through the Inspectors initial post hearings note they outlined a need to increase the housing requirement by 3,529 dwellings and add 53 more hectares of employment land, it was subsequently put forward for allocation by the city Council. The examination has moved to main modifications with the site removed from the Green Belt and allocated for development, thus there is a reasonable prospect that the site will be removed from the Green Belt and allocated for residential development in the near future which is material in the consideration of our client's land in North East Derbyshire (a point acknowledged by the Council).
- 1.4. North East Derbyshire Council are now consulting on its latest material through an additional Regulation 18 consultation. Specifically, the current consultation is focussed on the strategic approach to the location of development and a refined schedule of sites all of which have passed through both the initial desktop screening, and further detailed stages of assessment.
- 1.5. It is acknowledged that the Council were previously unable to demonstrate exceptional circumstances that could outweigh perceived harm enough to warrant removal of land from the Green Belt through the development of the adopted Local Plan. However it is considered that the context within which plan

making is being undertaken today – driven by central Government ambitions for enhanced housing delivery (1.5 million net additional homes in England by the next General Election), supported by a raft of changes to the National Planning Policy Framework (NPPF) – has fundamentally changed in favour of significantly boosting housing supply locally, including via the increased utilisation of Green Belt sites (as confirmed by Paragraph 146 of the Framework), but only where such sites meet the Golden Rules of Paragraph 156 and 157 of the Framework, providing enhanced public benefits.

- 1.6. This site represents a viable option for helping North East Derbyshire to deliver on its (much increased) housing need whilst minimising Green Belt harm and is fully compatible with the current Framework and its approach to the utilisation of Green Belt to meet housing needs in full.
- 1.7. The NPPF and Standard Method were published on 12th December 2024 and the updated Local Housing Need for the district has significantly increased from 224 dwellings per annum (dpa) to 605 dpa as of August 2025 (utilising the latest adjustment factor). The Council will be required to allocate sufficient residential sites to deliver the housing need and we believe this will need to include the use of currently designated Green Belt land.
- 1.8. These representations are prepared on behalf of the landowner, however conversations are being held with a number of interested housebuilders to advance the site if selected for allocation.

2. Representations

45900 – Land at White Lane Farm, White Lane, Sheffield

- 2.1. The consultation invites specific comments on sites which have been the subject of further testing and been included within the refined schedule. This section seeks to provide site specific commentary to promote its onward selection as a future allocation. Comments are limited to our client's interests only at this stage.

Site overview

- 2.2. The site comprises several field parcels between Carter Hall Lane to the south, White Lane, the Sheffield Supertram and Birley Lane to the north. The field parcels are typically bounded by mature hedgerows and scattered trees with an area of woodland to the southeast containing this part of the site. Running through the southern parcels of the site is Robin Brook, with associated mature vegetation. This also runs through the land in Sheffield, and a buffer to the brook is proposed as part of the emerging policy. Neighbouring uses include residential, agricultural and recreation.
- 2.3. The site is located immediately adjacent to the southern urban fringe of Sheffield. Whilst the adopted spatial hierarchy did not include Sheffield as a named tier, nor did the strategy direct any growth to Sheffield, it is a demonstrably sustainable location, benefiting from high public transport accessibility and access to services. It is therefore proposed to be a Level 1 settlement which is entirely logical.



Figure 2: The site

- 2.4. The Council should note that the landownership extends further east than the land submitted, and this land could be available if required for BNG offsetting, landscaping, etc. The above land was considered to represent a suitable boundary having regard for the site's opportunities and constraints, particularly defining a site with a strong defensible eastern boundary, but should the Council wish to amend the land, for any reason, then we are willing to discuss this.

Site feasibility

- 2.5. Access to the site is for further consideration but would likely be achieved directly from White Lane (B6388), with some potential to access the site through the land to the west in Sheffield City Council's administrative area (draft allocated) but under the same land ownership.
- 2.6. The site would be well serviced by public transport, with a Supertram stop circa 800m from the site and bus stops located less than 400m away on Jaunty Road, well served by the 8 and 8a services.
- 2.7. It is noted that this proximity to the Supertram would, if the draft NPPF *policy S5: Principle of development outside settlements* is continued in the publication version this summer, the site, qualify as a station which provides a high level of services to jobs and services, and where development of the site would be appropriate even if not allocated through the Plan. As such, even if this land was not to be allocated, it could be advanced under provisions of the emerging Framework. This suggests strongly that the land should be allocated for development, so the Council can benefit from the allocation in terms of meeting the Plan's housing needs and can also have more control over any development through site specific policy.
- 2.8. The site is entirely within Flood Zone 1 thus at low risk of flooding from rivers or sea and only small pockets of the site are subject to limited surface water flood risk, which are considered manageable through usual surface water management systems (SuDS).
- 2.9. The site is located within the Moss Valley Conservation Area, discussed below. There are no other listed heritage assets within the site or in particularly close proximity to it. The nearest is a cluster of Grade II listed buildings 'Range of Farm Buildings South East of Carter Hall Farmhouse' which are located approximately 500m south from the southern boundary of the site.
- 2.10. The site is supported by a willing landowner – conversations with a number of housebuilders are ongoing.
- 2.11. The site is within the Green Belt and within the extensive Moss Valley Conservation Area. These constraints are surmountable and considered in more detail below.
- 2.12. As part of the consultation, the Council have published a summary of key outstanding issues that they would need to see appropriately addressed for the site to be considered suitable for selection as a future allocation. The following sub-sections addresses each of the remaining issues highlighted by the Council through this consultation in turn. Work is ongoing to undertake additional evidence as set out in the Council's correspondence.

Site issue – location within Moss Valley Conservation Area

- 2.13. Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes provision for local planning authorities to designate Conservation Areas because of their "***special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance***". The Moss Valley Conservation Area was designated by North East Derbyshire District Council on 3rd May 1990. There is no character appraisal for this designated asset nor publicly accessible management plan. Reasons for its designation are only covered within the planning committee report supporting its original designation. Moss Valley is acknowledged to be a landscape of historic interest in its own right, there being a range of natural and man-made elements which comprise its special character, and the presence of vernacular buildings, farmsteads and early industrial sites.
- 2.14. The Moss Valley Conservation Area is a large designation covering an area of approximately 1,660 hectares. It includes a number of small to medium sized settlements containing a mix of types of character including modern dwellings such as Lightwood, Troway, Highlane, Ridgeway, Ridgeway Moor, Ford and part of Marsh Lane so is not exclusively rural.
- 2.15. The site is located adjacent to the Sheffield urban area and is adjacent to areas of woodland and contains a number of urbanising influences, giving the site a distinctly peri-urban character, particularly when regard is had for the emergent development inside of the Sheffield City boundary which is also being promoted by Fisher German. Moreover, the site boundary has been drawn to border existing mature vegetation and

woodland which will help contain development and provide visual screening to the wider retained conservation area beyond.

- 2.16. Development of the site would result in a negligible amount of rural land from the conservation area. Even when considered cumulatively with other potential sites, the vast majority of the Conservation Area would be retained and harms are assumed to be on the lower end of the less than substantial threshold, particularly given the overall scale of the Conservation Area and lack of supporting evidence on areas of importance. There are no known industrial archaeology sites within the site or in close proximity of the site's boundaries. No designated assets are in close proximity to the site and there would be no intervisibility between the site and the setting of heritage assets listed outside of the site. T
- 2.17. In terms of natural elements of the conservation area, there are no designations within the site nor in particularly close proximity. The site is active farmland and as such is highly unlikely to be rich in wildlife habitat. Boundary hedgerows and trees within the site would be predominantly retained and supplemented with additional planting as part of a comprehensive landscaping strategy which would help to maintain the grain of the existing field layout and provide ecological. Changing topography and belts of trees in close proximity to the site mean that residential scale development on the site is unlikely to be visible from multiple points within the conservation area, notwithstanding also the opportunity for suitable landscape mitigation to be incorporated with any future proposal for the site.
- 2.18. In view of the above, the site's location within the Moss alley Conservation Area does not amount to a strong reason for restricting development at this location as intended by Footnote 7 of the NPPF and reference to designated heritage assets. Moreover, any harms arising to the Conservation Area are considered to be less than substantial and clearly outweighed against the public benefits arising through the development.

Site issue – location within the Green Belt

- 2.19. The site is presently designated as Green Belt. Having regard for the recently published NPPF (December 2024), it is clear in paragraph 146 that Green Belt land can be utilised in 'exceptional circumstances' where development needs justify release. It states that ***"Exceptional circumstances, in this context include... instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan"***.
- 2.20. Given the significant uplift in housing need applicable to North East Derbyshire as a result of the revised standard method for calculating Local Housing Need, we cannot envisage a circumstance whereby North East Derbyshire will not need to review its Green Belt boundaries to accommodate its demonstrable growth needs, particularly given the need to ensure 'sustainable patterns of development' as advocated by Paragraph 148 of the NPPF. Exceptional circumstances therefore do exist. With this in mind, an assessment of whether the release of the site from the Green Belt would fundamentally undermine the five purposes of the Green Belt is set out in Table 1.
- 2.21. It is acknowledged that the Council are committed to producing an updated Green Belt Review to be published alongside a Publication Draft Local Plan later this year. This is necessary to reflect both the updates to the NPPF in 2024 but also the updates to the PPG 2025, particularly the updated guidance in respect of purposes A,B and D which are relevant to the identification of Grey Belt land. We provide the below commentary in respect of the site and its performance against the five purposes of the Green Belt.

Table 1: Site Assessment of Five Purposes of Green Belt

Five Purposes of the Green Belt	Assessment
A - to check the unrestricted sprawl of large built-up areas;	Sheffield is acknowledged to be a large built-up area. The PPG affirms in relation to purpose A that land which is free from development, lack features to contain development and through which the development would result in an incongruous pattern of development (e.g an 'extended finger' of development into the Green Belt) may be considered to perform strongly against purpose A. The PPG continues that moderate performance against purpose A includes land which has physical feature(s) in reasonable proximity that could restrict and contain development, be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development, contain existing development and being subject to other urbanising influences. The site borders a number of features that contain development, forming strong defensible boundaries to the Green Belt, including roads, mature trees, woodland, field boundaries and recreational uses with associated landscaping. Any scheme advanced would seek to use landscaping strategically, to strengthen areas that are perceived to be weaker and to supplement stronger boundaries, including the belt of trees which enclose the south-eastern corner of the site. It is considered that the proximity to Sheffield, including allocated emerging development, and features such as main roads and tram tracks which pass through the site serve to urbanise the site giving it a peri-urban character, distinct from the wider Green Belt. It is considered having regard for the PPG guidance, and mitigation which can be required as part of policy, that the site at worst should be assessed as having a moderate function. It is well defined by features which contain development. It has clear urbanising influences, and would not result in an incongruous pattern of development, particularly when considered alongside the allocation to the west in Sheffield.
B - to prevent neighbouring towns merging into one another;	The PPG confirms areas that contribute strongly against Purpose B are likely to be free of existing development and form a substantial part of a gap between towns and/or development of which would be likely to result in the loss of visual separation of towns. Areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to) forming a small part of the gap between towns, being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation. Land which provides weak or no contribution includes land which does not form part of a gap between towns and/or forms part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation. This land is adjacent to the Sheffield urban fringe. The PPG is clear that purpose B does not relate to villages. The nearest towns of relevance are therefore Dronfield and Eckington. Chesterfield is larger but further south with further additional intervening built form, including the aforementioned towns. Considering Dronfield first, there is existing urban form of Sheffield between the site and Dronfield, including the development near to the site to the south of Charnock Park and suburbs such as Jordanthorpe which are

	significantly closer to Dronfield than the site. Similarly for Eckington, where areas such as Mosborough and Halfway are far closer to Eckington and for where the gap between Eckington and Sheffield. As such, the site plays a far more limited role in terms of the separation of these settlements, and is certainly not the most sensitive part in terms of maintaining separation. The land does not form a substantial gap between towns, nor would its development result in the loss of visual separation of towns. The site cannot therefore score strongly against purpose B. The land does technically form a gap between towns, but only a very small part. Due to the distances and intervening landform, the development of the site would have a negligible impact on the physical or perceived separation of towns, therefore should be afforded a weak score against this purpose.
C - to assist in safeguarding the countryside from encroachment;	All greenfield development would ultimately result in an element of encroachment. The site however benefits from both being well related to Sheffield and being well defined by existing boundary features. These matters limit the urbanising effects of development, protecting the wider countryside beyond from undue impacts and will assist any development to assimilate into the landscape. This is particularly the case when regard is had for the land to the west of the site earmarked for development inside the City boundary. As such, any contribution is considered to be moderate at worst.
D - to preserve the setting and special character of historic towns; and	The Site is located within the Moss Valley Conservation Area however it does not form a significant part of the conservation area, making no specific contribution to its special character. Further, there is no character appraisal or management plan supporting the designation. Moreover, the purpose refers to historic towns specifically, not wider historic interests (which are otherwise protected through other means – see Footnote 7 below). The PPG states to perform strongly land should form part of the setting of the historic town and make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town. It is not considered that the site forms part of the setting to the historic elements of Sheffield. This was not alleged as part of the neighbouring parcel inside the City Boundary as part of the examination process for that site. Land that forms a weak purpose either do not form part of the setting of a historic town and have no visual, physical, or experiential connection to the historic aspects of the town. As such, the site is considered to score weakly against purpose D.
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The Council should exhaust all available brownfield options, however given the scale of need and lack of suitable sites it is considered inevitable greenfield land will be required, as it was deemed to in Sheffield. As such, all greenfield sites should score consistently against this purpose, likely weak.
Footnote 7 (excluding Grey Belt)	Whilst not a purpose of the Green Belt, the NPFP is clear that Footnote 7 is a relevant matter for the consideration of Grey Belt, particularly where the application of Footnote 7 protections would provide strong reason to refuse or restrict the development. In accordance with <i>Wrotham Parish Council v SSHCLG</i> (High Court) (2026) conclusions regard is not only had for the land, but for the scheme advanced. Whilst in Plan making, regard cannot be had for a specific scheme, the conclusions of this case should still apply. Logically, a plan can through policy provide a requirement for any necessary mitigation, this could include areas to be kept free from development for example, as discussed below.

	The site is not unduly impacted by flood risk, being only limitedly impacted by surface water flood risk, though this is considered easily mitigatable. The development of the site is not considered likely to have undue impacts on Listed Buildings. The key footnote 7 designation is therefore the Moss Valley Conservation Area, however, as established above, the impacts on the Moss Valley Conservation Area are limited in scale and effect, and would not result in a strong reason to restrict or refuse development. As such, no Footnote 7 constraint is considered to provide strong reason to restrict or refuse development.
Conclusion	Development of the site would not fundamentally undermine the five purposes (taken together) of the Green Belt. Furthermore, the site does not strongly contribute to purposes (a), (b) or (d) of paragraph 143, nor do the application of policies relating to footnote 7 designations (excluding Green Belt) provide a strong reason for refusing or restricting development. As such, the site would meet the definition of Grey Belt set out in the NPPF.

2.22. As set out above, we consider that Footnote 7 designations – specifically the Moss Valley Conservation Area designated heritage asset – do not provide strong reasons for restricting development. Additional context to this is the shift in recognition of Grey Belt designation from being perceived as resulting from a purely land-based assessment to one which should take account of a proposal (including any mitigation provided). In *Wrotham Parish Council v SSHCLG* (Ref: AC-2025-LON-000898), the High Court concluded that the Inspector had erred in their judgment in only assessing the land, rather than the proposal – which included mitigation – in concluding on impacts on Footnote 7 designations.

2.23. Whilst this finding relates to decision making on a specific proposal with explicit mitigation measures proposed, the principle logically should be carried across when considering potential allocation, particularly as any site-specific policy *can* appropriately require mitigation measures as part of any future proposal. This is further underpinned by the Government's clear intention to remove reference to Footnote 7 from the grey belt definition within the NPPF, which is a logical refinement given that decision makers have at their disposal the tools to refuse permission where a particular designation (such as a heritage asset) would genuinely provide strong reasons for refusal anyway. There is no need for grey belt designation to repeat such protections which results in the artificial narrowing of the scope of land that can fall within grey belt category.

2.24. With the above in mind, the site would meet the definition of Grey Belt set out in the NPPF. Paragraph 155 of the NPPF (2024) confirms development in the Green Belt should not be regarded as inappropriate where:

- the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan,
- there is a demonstrable unmet need for the type of development proposed,
- the development would be in a sustainable location and
- where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.

2.25. With regard to the 'Golden Rules' set out in paragraphs 156-157 of the NPPF, the affordable housing requirement to be accommodated on the site will be set at a higher level than that which would otherwise apply to land, subject to viability evidence produced by the Council. The development proposal on the site will include any necessary improvements to local or national infrastructure as well as provision of new, or improvements to existing, green spaces that are accessible to the public.

2.26. Development of this site would meet all of the criteria of NPPF Paragraph 155 and therefore would not constitute inappropriate development in the Green Belt. Given its Grey Belt status, its release from the Green Belt should be prioritised ahead of other Green Belt locations (NPPF Paragraph 148).

Site issue – landscape impact

2.27. The site is located adjacent to the Sheffield urban fringe, and when considered with neighbouring emerging development and key urbanising influences (tramlines, existing development and key roads) has a distinct per-urban character. The presence of existing mature vegetation on the site's key boundaries help mitigate the impacts of development. Any proposal would be supported by a landscaping strategy which seeks to supplement existing tree belts to ensure proposals assimilate successfully into the landscape.

Site issue – relationship with Moss Valley Meadows SSSI & Moss Valley SSSI

2.28. Moss Valley Meadows SSSI is separated into three parcels and designated on account of the presence of patches of exceptional species-rich grassland. The development of the site is not anticipated to have a direct impact on any such area, given the lack of public access. As such, whilst being relatively close to the nearest parcel, circa 500m, impacts are considered negligible. Turning to the Moss Valley SSSI, this is 2.2km away. Whilst there is public access through right of way, this distance suggests access is not likely to be dramatically increased through the development of the site. Whilst the site is hydraulically linked through the Robin Brook, with mitigation impacts are considered again to be negligible.

2.29. In summary the principles of such mitigation could include the implementation of pollution prevention measures during construction, implementation of an appropriately designed drainage strategy and implementation of an integrated open space strategy to encourage walkers to stay in the vicinity. These principles would need to be built upon in consultation with Natural England.

Site issue – other ecological considerations

2.30. Site considered to be of relatively low ecological value overall, with ecological value largely coming from site boundaries which will largely be retained. As such, ecology not considered reason to preclude ecology. Moreover, extended landholding ensures significant potential to deliver BNG without undue impact on site capacity.

Site issue – presence of some risk of surface water flooding

2.31. The site is wholly within Flood Zone 1. However, with regards to surface water flooding and the presence of limited risk on some small sections of the site, onward site promotion and evidence to inform a planning application would include a Flood Risk Assessment and the site would be underpinned with a Sustainable Urban Drainage Strategy.

Site issue – location within the Coal Authority 'High Risk' area

2.32. The coal mining 'high risk' zone is an extensive designation covering the entirety of multiple local planning authority areas. A Coal Mining Risk Assessment will be forthcoming as an important evidence base component to support a future planning application. Within this, any required mitigation would be identified.

Site issue - Capacity

2.33. Council assessment assumes development of 350 dwellings. This may be achievable, but it is understood that there would need to be areas for landscaping, drainage and amenity. Overall however, the early identification of this site would allow a more integrated approach to delivery having regard for the neighbouring allocation within the city boundary and potentially the ability for joint masterplanning - though this is considered an additional benefit, not an absolute requirement and it would be incumbent on any party to ensure that the development appropriately worked with neighbouring uses.

Site issue – Public Right of Way

- 2.34. The Council assessment correctly identifies a public right of way which crosses the site, which connects Carter Hall Lane and White Lane. This will be incorporated into the proposal and improved, given it provides an important link, albeit there is significant potential within the site to increase permeability and create new routes in and around the site.

Site issue – Robin Brook

- 2.35. The Council will note as part of the emergent allocation of the land within the City Boundary, a buffer is proposed in policy from the Robin Brook and any future development. There is therefore clear potential to continue the utilisation of the Robin Brook as a key Green/Blue finger, creating an attractive amenity route connecting through both sites, and providing quick and attractive access to the northwest, including key services and public transport stops.

Summary

- 2.36. The site is included in the refined schedule of sites following initial assessment by the Council and the Land Availability Assessment categorises the site as 'amber', indicating 'some constraints'. The issues key issues influencing the site's current rating are addressed above and we consider are all resolvable through appropriate mitigation which will be forthcoming. This, as well as overall emerging strategic approach to the location of growth which favours Level 1 locations such as sustainable urban fringes, provides strong justification for allocating the site for residential development in the future Local Plan.

Development needs – Housing

Option 1 – Standard Method

- 2.37. The NPPF is clear at Paragraph 62 that ***"to determine the number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance"***; effectively, the housing need informed by the standard method is the 'policy-off' assessment of the minimum number of homes needed in an area. Plugging this into a consideration of wider environmental, economic and social factors, policies and constraints then determines the housing requirement. The NPPF is clear that ***"the overall aim should be to meet an area's identified housing need"***. There has to be a well evidenced and compelling argument set out by a plan making authority to justify planning for a lower housing requirement than the housing need identified using the Standard Method. The NPPG makes clear there are some 'specific circumstances' whereby this might be justified. The specific circumstances set out at Paragraph 014 of the NPPG do not apply in the case of North East Derbyshire, and we do not consider that any insurmountable constraints exist within the District to justify the pursuit of a housing requirement which diverges negatively from the Standard Method informed housing need. Such an approach we consider would be found to be unsound.
- 2.38. In view of the above, as an absolute minimum, Option 1 as set out within the current consultation document should be pursued. In fact, as considered in more detail below, there is evidence in favour of planning for above the Standard Method derived housing need figure.

Option 3 – above Standard Method

- 2.39. Whilst the NPPF is clear that the overall aim of strategic policies relating to the delivery of a sufficient supply of homes should be to meet an area's identified housing need, it is also clear that a Standard Method derived housing need will identify the ***minimum*** number of homes needed. The NPPF empowers local planning authorities to apply a 'policy-on' approach which should factor in local and strategic ambitions (including economic) as well as general affordability pressures to inform their housing requirement, which may justify pursuit of an increased requirement. Such an approach is closely aligned with the latest Government ambitions to significantly boost the supply of new homes nationally.
- 2.40. North East Derbyshire is strategically well placed adjacent to Sheffield (the 4th largest city in England) and Chesterfield. Both Sheffield and Chesterfield are the focus of significant growth ambitions set out in their respective Combined Authority economic plans and from this a growth in a wide range of employment

sectors is targeted. Long term ambitions for these cities places North East Derbyshire and its main towns – including Dronfield – perfectly to benefit and, as part of this, react to likely further increase in demand for new homes. Given the spatial relationship between North East Derbyshire and the cities, the housing requirement eventually promoted should take into account these regional ambitions which indicate a need to advance beyond the Standard Method derived minimum.

- 2.41. As with the overall Standard Method derived housing need, affordable housing need has also significantly increased since adoption of the current Local Plan. The Housing Needs Assessment (2024) identifies an overall need of 356 affordable dwellings per annum – over 58% of the overall need – and makes clear that ***“provision of new affordable housing is an important and pressing issue in the area”***. The new Local Plan could be proactive in addressing this, by planning to deliver more than the Standard Method derived housing need.

Mix of scale and type of housing sites should be sought

- 2.42. The refined schedule of sites evidences that the Council intend to include within the new Local Plan a range of site sizes, also commensurate with the level of sustainability of the varied locations for growth also being supported. We support this approach in principle; the NPPF is clear at Paragraph 72 that ***“planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”***. The provision of a range of site allocations sizes will help to boost housing delivery which in turn will support flexible and phased delivery from a range of providers. Critically, the provision of a range of site allocation sizes across multiple locations is a major factor in sustaining a robust and deliverable housing pipeline and five-year housing land supply. Our client’s site benefits from a strong market, and conversations with housebuilders are already ongoing, demonstrating interest to develop in the short term.
- 2.43. Linked to this also, we continue to support an approach which seeks to allocate a range of types of sites. Although not a topic of this consultation, the 2025 consultation identified seven site type options which between them would provide a varied range of potential impacts. Development in any location, by its very nature, will result in some level of impact on its immediate context. However the key, in our view, is to focus on delivering housing in the locations where it is most needed whilst minimising impacts and maximising potential benefits. We agree therefore with the findings of the Sustainability Appraisal which, at paragraph E20 summarises that ***“it is likely that a combination of different site type options will allow for the most sustainable development strategy, informed by a robust evidence base to determine the capacity of different locations in the district to accommodate proposed growth that is aligned with the relative scale and character of existing settlements”***.

Development needs - employment

- 2.44. As set out in our previous representations, the new Local Plan should be aspirational and a key component of this will be the district’s ability to accommodate ambitious employment growth. As such, the Council should plan for the district’s employment land requirements at the upper end of the 15-31 ha as recommended in the Employment Needs Assessment (Option 2 in the current consultation document). The upper end of the estimate quite rightly takes account of the ‘policy on’ scenario, recognising the district’s local economic growth aspirations and key growth sectors of the economy. Given the significantly increased Standard Method derived housing need for the district and the need for it to be met as a minimum, it is also correct that labour supply resulting from new housing is taken into account when identifying the quantity of employment land that will be required to service the district going forward. Not adopting this approach risks artificially constraining economic growth which would be in direct contravention of NPPF ambitions, particularly its call for the planning system to build a strong, responsive and competitive economy. We do not consider the district to be so constrained that the identified quantum of employment land within the upper estimate would be undeliverable, particularly when you consider its relationship with the economic growth ambitions of the wider area, including Sheffield.

Spatial distribution of development

- 2.45. In principle we support the Council's proposed approach to the location of development. Specifically, that the level of priority of location for accommodating growth correlates with the level of sustainability and role of the type of settlement. We agree that 'Priority 1 Locations' should include as indicative locations those listed i.e. the edge of Chesterfield/ Sheffield, new settlement/ strategic sites and level 1 settlements. It is notable that the Sustainability Appraisal does not envisage any major negative effects from accommodating development at the priority locations. Indeed, providing growth to the priority 1 locations in the first instance represents a sustainable growth strategy which would, critically, leverage existing infrastructure and services provided by them, support the vitality and viability of their centres and facilitate access to enhanced sustainable transport options they provide. Moreover, such locations are most likely to contribute to a sustainable pattern of development in respect of any Green Belt release (paragraph 148 of the Framework).
- 2.46. We also agree that allocations should be assigned using a 'cascade' approach. Through this approach, the higher priority locations are likely to receive higher levels of growth which is logical and supported in evidence, albeit the Council will need to remain cognisant of factors which may determine slight divergence from this if necessary, for example in providing for strongly evidenced localised need or responding to key constraints which, for example, may determine that lower priority locations, at least in some scenarios, represent the more suitable location for growth. We note that the consultation responses received are largely in favour of such an approach also.

Sheffield as a location for growth

- 2.47. Sheffield is a nationally important core city and for which there is clear linkages to North East Derbyshire, as there will be with Chesterfield to a lesser extent. It is telling in the 2021 census that North East Derbyshire was one of the top authorities where usual residents commuted to a workplace outside their respective authority with 45.0% of residents commuting outside the LPA boundary. This is marginally behind Bolsover (47.1%) which has a similar spatial and geographic profile and where there is a high reliance on neighbouring urban areas. Given such high levels of commuting and reliance on Sheffield, it is considered perfectly reasonable for development to be located on the Sheffield urban fringe.

Strategic sites and new settlements

- 2.48. With the above considerations in mind, whilst we do not object to the principle of identifying strategic sites and new settlements as part of 'Priority 1 Locations' for growth, we maintain reservations around the suitability of strategic site 'Duckmanton Moor' (now merged from previous sites 45227 and 45541) which is expected to be able to accommodate 2000-3000 dwellings.
- 2.49. The southern element of the strategic site (45227) does not directly relate to any existing settlement form and as such would represent an illogical and significant intrusion into the open countryside at this location. The nearest settlement – Arkwright Town to the north – is distant from this element of the site without any sense of continuity. Similarly, whilst technically attached to Arkwright Town to its north west and Long Duckmanton to its north east, the northern element of the site (45541) would result in an illogical and incongruent built form exclusively to the south of A632, awkwardly conjoining both settlements with notable impacts on the countryside at this location including its openness and any landscape value.
- 2.50. Both Arkwright Town and Long Duckmanton offer limited provision of services, facilities and employment as highlighted also by the recent Settlement Hierarchy study, with a significant number of settlements rated as being more sustainable locations for growth. Whilst settlements such as Arkwright Town and Long Duckmanton could accommodate some growth (and, indeed, a distribution of growth across the district we consider to be a sustainable approach), the scale of growth being considered through the delivery of this newly merged strategic site would be entirely at odds with their scale and offer and such an approach we consider to be unsustainable.
- 2.51. A significant proportion of the site is occupied by established woodland and this represents a substantial development constraint. Given the likely ecological value of the woodland area, its inclusion within the site will establish a considerable BNG baseline to address which has the potential to undermine viability of the

site as a whole. Retention of the asset would significantly reduce the actual developable area provided by the potential allocation and limits the extent to which the site could contribute to delivering the district's housing needs. Reducing the extent of the site to exclude the woodland area would result in the same outcome, preventing the delivery of a critical mass of dwellings required to fund and maintain new service provision necessary to make new free-standing communities viable and sustainable, particularly in this location where existing infrastructure provision is so limited.

Sustainability Appraisal (SA) Addendum March 2026

- 2.52. The SA Addendum has been produced to assess 271 reasonable alternative sites for residential use which have been identified by the Council – following a comprehensive assessment and filtering process – as being genuinely capable of being selected as allocations within the emerging Local Plan. This assessment does not take into account any mitigation, which of course, as explored in more detail above for our client's site, can and will be forthcoming where required. The site is assessed under 45900 – White Lane Farm.
- 2.53. Whilst we have not carried out an exhaustive review of the SA Addendum, we do have some concerns which we think are important to raise now, relating to scores applied and, in some cases, what appears to be a mismatch between the stated method for arriving at appropriate scores and its application to this site.
- 2.54. We note that the site has been scored negatively for being within a fluvial flood zone which is not accurate. There are moreover logical inconsistencies which whilst may be correct in the methodology of the SA, does not contribute to logical conclusions in respect of good spatial planning, thus whilst the SA is a useful tool, it should not alone be used to make planning decisions. For example, the site is scored as a negatively for access to employment and higher education opportunities, despite being in easy walking distance of the Supertram network, meaning it arguably has some of the best opportunities to access higher order services regularly. Whilst it is acknowledged that to be one of the best performing sites for transport and access, this still potentially underplays the true access benefits associated with the site. This is further compounded at C.13.2.1 which states that there are *"two tram stations serve areas to the north of North East Derbyshire district, 'Halfway Supertram Station' and 'Herdings Park Supertram Station'"* excluding White Lane tram stop which could reasonably serve our clients interests – 45900.