



Ref: PT.D5646/1P.Reg.18 Rep
Date: 26th March 2026

Planning Policy and Environment Team
North East Derbyshire District Council
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Chesterfield
S42 6NG

Local.plan@ne-derbyshire.gov.uk

Dear Sir / Madam,

Re: Representation to North East Derbyshire District Council's Reg. 18 Issues & Options Consultation on the Strategic Approach to the Location of Development and Refined Sites (March/April 2026); Land West of Unstone Green, Dronfield ref. 45168

DLP Planning Ltd, on behalf of the Landowners ([REDACTED]) and the developer of the Site, Homes by Honey, submit this representation to the Reg. 18 Issues and Options Consultation 2026 to promote Land West of Unstone Green, Dronfield (the 'Submission Site'; site ref. 45168) as a housing allocation in the forthcoming Local Plan Review.

The current Reg. 18 Consultation follows last year's Issues & Options Consultation and focuses on the strategic approach to the location of development and refined sites. It is our understanding that the refined sites were further assessed as part of the Council's Housing Land Availability Assessment (Housing LAA). This consultation, however, does not propose any site allocations and we note that the current Green Belt review in support of the draft Plan will only be finished by June this year.

Please note that the Submission Site was submitted to the Council for pre-application advice in December 2025 and discussions with Planning Officer are ongoing.

The abovementioned parties would welcome a discussion with Planning Officers to consider the most effective way to deliver the Submission Site over the period of a new Local Plan.

Proposed Approach to the Location of Development/Spatial Distribution

The Council's previous consultation included questions on the overall approach to the spatial distribution of development, and an analysis of the findings informed their proposed approach to the location of development. The Council identified Priority 1 Locations which now include Edges of Chesterfield/Sheffield; New Settlement/Strategic Sites; and Level 1 Settlements – Main Towns.

It is acknowledged that the Council have broadened the definition of the Level 1 hierarchy as set out in the adopted Local Plan. Developing sites near/adjacent to Chesterfield (and potentially Sheffield) makes sense in planning terms as this is close to existing local services and facilities. However, the Council finds that there is a clear mismatch between the preferred locations of growth (as highlighted by respondents) and the availability/suitability of land.



A review of the submitted sites shows that except for Eckington South (which, in effect, falls under a new settlement/strategic site category) most sites are located between the south of Chesterfield and Wingerworth, in an area where Green Belt Purpose A and B are strongly performing. The Submission Site, however, is located to the north of the boundary with Chesterfield, and hence, lies within the identified Priority 1 Location on the Edge of Chesterfield.

Given the above, if the Council want to allocate a meaningful level of sites on the edge of Chesterfield, there are not many sites which seem to be suitable, but the Submission Site is available now, suitable and deliverable now.

Settlement Hierarchy & Sustainability

We understand that the Settlement Hierarchy Topic Paper refines the evidence from the Settlement Role and Function Study to establish bandings for the various settlement levels. It also considers the spatial pattern of settlements, the services and facilities within, and their relation to each other to identify whether the sustainability of some smaller rural settlements would be more accurately represented when they are considered collectively, rather than in isolation. In this regard the Council states that *"settlement clusters have been identified in the areas around Shirland, Pilsley and Unstone, areas where groups of settlements demonstrate strong and demonstrable functional relationships, rather than simply geographic proximity."*

Further to this, in Figure 8: Proposed Settlement Hierarchy, the Council present a 'league table' of settlements and, for the first time, they include the 'Unstone Cluster' (Unstone, Unstone Crow Lane & Unstone Green) which scores a total of 14 points which is just below Renishaw (with 17 points) that scores the lowest of the Larger Villages / Level 2 Settlements. We agree that Unstone Green needs to be seen in the context of the Unstone Cluster due to its proximity to Unstone/Unstone Crow Lane, functional relationship and opportunity to share services.

In this regard, the Unstone Clusters' sustainability is higher than when assessed in isolation and falls between Level 2 and Level 3 settlements. This approach supports the case for the Submission Site on the basis that connections to Unstone/Unstone Crow Lane can be enhanced, as discussed during the first pre-app meeting with the Planning Officer. For example, existing footpaths along the B6057 / Sheffield Road could be improved to provide better connectivity in the future.

Currently, the 'Sustainable Communities LAA Rating' of the Housing LAA scores 'Red' for the Submission Site which should be reviewed and based on the above findings and the 2026 Green Belt review it should be changed to 'Amber'.

Green Belt/grey belt

As the Council is aware, the planning policy landscape for Green Belt/grey belt assessments has considerably changed since the last Green Belt review in 2016/17. The Council confirms that the 2026 Green Belt review will be based on the detailed methodology set out in recent Planning Practice Guidance (PPG) with a clear focus on Green Belt Purpose A, B and D.

Our previous written representation from 13th August 2025 provided a grey belt assessment for the Submission Site based on the PPG's detailed methodology. In summary, we found for Purpose A – *to check the unrestricted sprawl of large urban areas*, that the Submission Site is currently contained by landscape form, rising land levels to the north and west, with housing to the east and new emerging development to the south. Further to this, it is considered that physical features contain

the Submission Site well, in particular Sylvia Road with Birch Hill Farm and existing woodland to the south/southwest and a line of trees and woodland to the west. The Submission Site is also partially enclosed by residential development in the southeast and southwest and relates well to the existing settlement. We therefore concluded that development of the Submission Site would not strongly contribute to Green Belt Purpose A and the Council also found in their LAA assessment that *“the land is visually well contained in the wider landscape.”*

Regarding Purpose B – to prevent neighbouring towns merging into one another, the PPG emphasises that this purpose relates to merging of towns, not villages. Unstone Green is a village, and hence, cannot be part of this assessment.

Regarding Purpose D – to preserve the setting and special character of historic towns, the PPG makes clear that where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. This is the case here.

Overall, it is considered that the Submission Site does not strongly contribute to Green Belt Purposes A, B or D and it does not cover nor affect areas or assets as listed in footnote 7 (other than Green Belt), and hence, does not provide a strong reason for refusing development. Taken together, it is considered that the Submission Site can be identified as grey belt land.

The Submission Site is deemed to be a relatively small parcel when compared to the wider Green Belt land in the north of the district which covers an extensive area of land. Development of the Site would not be deemed as narrowing the gap between Dronfield and Chesterfield; hence, the release of the Submission Site from Green Belt would not fundamentally undermine the purposes of the remaining Green Belt. We also consider that the Submission Site has potential to fully comply with the “Golden Rules”.

Other Issues Raised

- Access – The Council states that *“highway access may need to be confirmed further”*. As part of the pre-application enquiry to the Council a Pre-Application Highways Technical Note and a Preliminary Site Access Design was submitted. It is proposed to provide a new access into the Submission Site from the south by realigning and extending Sylvia Road. Alice Way may provide a secondary or emergency access. Please note, this preliminary site access design will be further discussed with Derbyshire County Council’s Highways team.
- Biodiversity – The Council says that desktop ecology advice finds a medium/high impact level of development upon biodiversity. A site visit will need to take place in the spring to further determine ecology impacts. A Preliminary Ecological Appraisal Report (PEAR) has been submitted in support of the pre-application enquiry which finds that the Submission Site is comprised mostly of grassland, woodland, hedgerow, scrub, and ruderal, which is of some botanical interest. Habitats are mainly noted for their value to support protected species and the PEAR therefore recommended undertaking further surveys including a badger survey, breeding birds survey, etc.
- Coal Mining/landfill – The Council found that the Submission Site is located within a Coal Authority development high risk area and it lays within a 250 metres buffer of a former landfill site. To investigate these risks further, it is intended to undertake a Phase I Site Investigation together with a Coal Mining Risk Assessment and a Land Stability Assessment. Based on this, potential risks can be identified and mitigation measures implemented within the layout of the scheme.
- Archaeology – The Council found that an archaeological assessment classifies the

Submission Site as having archaeological/ historic environment issues, but it might be suitable for allocation with appropriate site-specific policy. It is considered that this can be conditioned if necessary.

- Landscape – The Council noted that development on the site may have a moderate landscape impact. Although overlooked by residential areas to the east the land is visually well contained in the wider landscape. To this end, it is considered that a Landscape & Visual Impact Assessment may be needed to determine any potential negative impacts on the wider landscape. This can also inform a Green Belt Assessment of the Submission Site as referred to above.

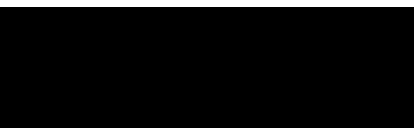
Summary

The representation demonstrates that:

- the Submission Site aligns with the proposed approach to the location of development and spatial distribution, particularly the Submission Site lies within the identified Priority 1 Location on the Edge of Chesterfield and is available now, suitable and deliverable now.
- the Unstone Clusters' sustainability is higher than when assessed in isolation and falls between Level 2 and Level 3 settlements. This supports the case for the Submission Site as it falls within a more sustainable location if well connected to Unstone/Unstone Crow Lane. The 'Sustainable Communities LAA Rating' scores 'red' for the Submission Site and should be reviewed.
- It is considered that the Submission Site does not strongly contribute to Green Belt Purposes A, B or D and can be identified as grey belt.
- Other issues raised like access, biodiversity, coal mining, etc. has either already been investigated or will be further investigated in support of a planning application.

Therefore, the Submission Site should be allocated for housing in the emerging Local Plan. The aforementioned parties would welcome a discussion with Officers to bring the Submission Site forward and together with a low Green Belt score the Submission Site should be considered favourably by the Council.

Yours faithfully,

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