

Mr Richard Bryant
Forward Planning
Chesterfield Borough Council
Town Hall, Rose Hill
Chesterfield
Derbyshire S40 1LP

Ian Stephenson
Strategic Director

Environmental Services Department
Shand House
Dale Road South
Matlock
Derbyshire
DE4 3RY

Telephone: [REDACTED]
Facsimile: [REDACTED]
Our Ref: PD/IG/2104
Your Ref:
Date: 22 February 2013

Dear Mr Bryant

Consultation: Chesterfield Borough Council - Staveley and Rother Valley Corridor Area Action Plan

Thank you for consulting Derbyshire County Council (DCC) on the above draft Area Action Plan (AAP). I am writing to make the following technical officer comments on housing, infrastructure, landscape, waterways development and transport.

In addition, you are referred to the officer comments previously made by Derbyshire County Council (DCC) on the Core Strategy - Submission Version in our officer response dated 23 March 2012, and 3 August 2012.

Housing Policy Comments

The AAP Preferred Option covers a site of some 180 hectares and seeks to deliver 2,000 dwellings, up to 50ha of employment and a new local centre to serve the development, Barrow Hill and Hollingwood. From a housing policy and provision point of view, the overall aims and objectives of the Area Action Plan are fully supported, particularly the Housing – Key Objectives set out on page 13 that seek to deliver up to 2,000 dwellings on the site.

The Borough Council's Core Strategy has recently been through an Examination in Public. Chesterfield Borough Council (CBC) proposes to make provision for 7,600 dwellings in the Borough over the period 2012 to 2031, in line with the broad requirements of the East Midlands Regional Plan. The Staveley and Rother Valley Area is identified in the Core Strategy as a key strategic site to accommodate up to 2,000 dwellings. Both the Core Strategy housing target and identification of the Staveley Rother Valley Corridor Area as a key strategic housing site were supported by the County Council.

The position set out at paragraph 4.6 is accepted and supported that development of up to 2,000 dwellings on the site would help to reduce pressure for the development of both Greenfield and Green Belt sites elsewhere in the Borough, particularly in and around the Chesterfield urban area and smaller settlements. It would clearly have major regeneration benefits in bringing back into beneficial use a large contaminated brownfield site, in an area which has issues of social deprivation and high levels of unemployment.

Staveley district centre is located to the east of the site where there is a large Morrison's foodstore and other shop and service uses. Nevertheless, it is considered appropriate that such a large scale of residential development should also include its own local centre to serve the new development and widen the range of services and facilities available to other existing communities, such as Barrow Hill.

Given the extensive need for, and likely high cost of, remediation required on the site, viability is likely to be a key issue in the delivery of the quantum of housing development proposed on the site. Affordable and special needs housing provision will be an important requirement for the site but, given the high cost of remediation and associated viability issues, a flexible approach to the provision of affordable and special needs housing will be essential. The key Housing Objective set out on page 14 is, therefore, supported which seeks to take a flexible approach to affordable and special needs housing that reflects need and development viability.

Phasing is also an important issue given the high remediation costs and need for costly supporting infrastructure, particularly the new spine road. A phasing programme is set out on page 7, which appears to set out a sensible approach whereby early phases of new housing development would be located to utilise the existing highway network around Works Road and Hall Lane with later phases developed once the spine road is in place. This approach is supported.

The site is located in close proximity to a number of settlements, including Barrow Hill, New Whittington, Staveley, Hollingwood and Brimington. Good connectivity to these settlements is therefore essential if they are to benefit from the regeneration potential of the site. Again, in principle, the Masterplan appears to address this issue well with connectivity identified from the site to each of these settlements to varying degrees.

Infrastructure

Page 37 sets out a basic infrastructure/phasing schedule, however, more detail would be welcomed about infrastructure requirements and potential funding sources. It is noted that this is an evolving document that is being updated regularly.

Landscape

The landscape objective and vision on page 11 of the Preferred Option is fully supported.

It is welcomed that the landscape character and Green Infrastructure (GI) study provided by DCC has been positively fed into the AAP. It is recommended, however, that as further detail is developed the 'visually sensitive frontages' outlined in figure 2 on page 10 are incorporated to guide appropriate quality design.

With reference to Figure 3 on page 25, there is concern that the River Rother may be reduced in width and compromised by development pressures. A 'minimum protected width' could be established on either side of the river to ensure the capacity to deliver quality landscaping and GI. This should be wide enough to provide biodiversity links, as well as being a strong visual amenity corridor and landscape feature. If feasible, it is recommended that this principle is included under a new GI key objective, 'Enhance the River Rother and Chesterfield Canal as key GI assets and enhance public access.'

Transport

A key economic objective is to create a business park suitable for B1, B2 and B8 uses at the eastern end of the corridor with access to the Staveley Northern Loop Road and Junction 29a of the M1. The AAP adds that development should deliver a central spine road to provide vehicle access through the length of the site with connections across the River Rother. At its western end, this should be designed to facilitate further connection to a possible Chesterfield-Staveley Regeneration Route, and at its eastern end, to connect with Phase 1 of the Staveley Northern Loop Road which provides a link between Hall Lane and the M1 via junction 29a. A second phase of the Northern Loop Road would connect the site to Hall Lane and the A619; however, this has yet to be implemented.

The plan contains no information relating to transportation, or the environmental implications of the proposals and their deliverability. A more detailed response would require an evidence base which includes a summary of the key environmental issues as they relate to transport. Inevitably, as a result of the mitigation works likely to be required, more complex behavioural changes may occur leading to different travel patterns; for example drivers reassigning onto different routes. For this reason, it is recommended that a dynamic traffic model be used as a basis for developing any Transportation Assessment of this scheme. Any future assessment and appraisal work should consider both the unilateral and cumulative highway and transportation impacts of the site's development, and that of significant neighbouring schemes, and the manner by which any developer contributions might be assembled to address wider network and transportation mitigation.

In advance of any Transport Assessment results, however, the County Council would be concerned about the initial short term impacts on the local road network. In particular, there are concerns about traffic levels on the A619 at Troughbrook Hill and at its junction with Inkersall Green Road/Middlecroft Road.

An Environmental Statement which reflects Derbyshire's Local Transport Plan and the Department of Transport (DfT) Guidance on Transport Assessment (GTA) (March 2007) is recommended. Section 4 of the GTA should form the basis for this Assessment, and address:

- Reducing the need to travel, especially by car. At the outset thought should be given to reducing the need to travel, the types of uses (or mix of uses) and the scale of development in order to promote multipurpose or linked trips.
- Sustainable accessibility - promoting accessibility by all modes of travel, in particular public transport, cycling and walking; assessment of the likely travel behaviour to and from the proposed site; and the development of appropriate measures to influence travel behaviour.
- Dealing with residual trips - providing accurate quantitative and qualitative analyses of the predicted impacts of residual trips from the proposed development, and suitable measures to manage these impacts.
- Mitigation measures - ensuring as much as possible that the proposed mitigation measures avoid unnecessary physical improvements to highways and promote innovative and sustainable transport solutions. The Transportation Assessment should consider personal travel management, public transport and, where appropriate, freight movement.

It should be noted that a step change in the level of provision is likely, in view of the current, poor access to the site by sustainable modes.

The following should be covered in any subsequent supporting information:

- A review of the National and Local Transport Policy context. This should include Derbyshire's Local Transport Plan (LTP) and clearly indicate the relationship to the site with the Chesterfield-Staveley Regeneration Route and Staveley Northern Loop Road.
- An assessment of accessibility of the site including existing highway and public transport networks, walking and cycling facilities.
- A description of proposed access arrangements and any improvements to the adjacent road network.

- A description of initiatives to improve accessibility to the site by modes other than the private car, including public transport initiatives, proposals for access by walking and cycling and the production of a Framework Travel Plan.
- An assessment of traffic generation and distribution from the proposed development by HGV's and car traffic.
- Appraisal of the impact of development generated traffic on the adjacent highway network, and identification of transport improvements to mitigate the impact of development traffic.

A Travel Plan will be required, and the following are necessary to ensure the effectiveness of the plan and the audit of existing transport options and infrastructure:

- Site Location maps showing existing public transport corridors and areas served from the site by bus and, if appropriate, train;
- A full appraisal of sustainable transport facilities in the vicinity of the site including the condition of footways, cycle ways, secure parking, lighting and public transport facilities;
- All details with regard to public transport options should be listed including peak hour frequencies etc.;
- Measures proposed in the Travel Plan must be plausible and influenced by the site's strengths in terms of existing provision, and travel patterns in the local area. The measures proposed should be based upon the site review audit as described above.

Incentives and measures should be clearly identified and specific details explained, including specific proposals for implementation. A Travel Plan co-ordinator must be identified, whose responsibility would be the upkeep and maintenance of the Plan, and ensuring targets are met. Logical and plausible targets must be outlined within the Travel Plan with targets based upon likely future travel patterns. A review of existing information sources, such as the Census, or locally collected primary data, will aid this process. Targets must include proposals for the reduction of single occupancy car-borne trips, as well as modal shift targets for each given mode. On-site monitoring must be conducted from the outset of the Plan's lifespan (i.e. once occupation of the site begins) with full details of the periodic monitoring regime within the submitted document, including proposed dates for monitoring and the funding required for monitoring over the lifespan of the Plan. Details of enforcement measures that will be implemented if the Plan falls short of the required targets associated with the reduction of single occupancy car use will be required.

Environmental impact involves reducing the direct and indirect impacts of transport facilities on the environment of users and non-users. There are ten sub-objectives given in the DfT's Transport Analysis Guidance (TAG), including reducing noise, atmospheric pollution (including climate change and local air quality), impacts on countryside, wildlife, ancient monuments, and historic buildings. (Environmental Objective - TAG Unit 3.3).

The TAG also provides sub-objectives for:

- Safety: to reduce accidents and improve security. (Safety Objective TAG Unit 3.4).
- Economy: to improve economic efficiency for consumers, business users and providers of transport, improve reliability and the wider economic impacts, and get good value for money in relation to impacts on public accounts. (Economy Objective TAG Unit 3.5).
- Accessibility is concerned with the ability with which people can reach different locations and facilities by different modes. (Accessibility Objective TAG Unit 3.6).
- Integration aims to ensure that all decisions are taken in the context of the Government's integrated transport policy. (Integration Objective TAG Unit 3.7).

Accessibility issues that should be assessed include:

- access to the transport system - locating access points and links for pedestrians and cyclists to the wider transport network;
- access to the local area - providing transport nodes or interchanges for the proposed development that will benefit other developments and the local community as a whole;
- Community severance - ensuring that the development does not create barriers to access within the local community.

To determine the level of accessibility (in respect of public transport, cycling, and walking) for a specific site, or relative levels of accessibility for multiple sites, the preferred methodology would be to undertake accessibility modelling. This can be achieved by using a standard assessment tool such as ACCESSION, or any other appropriate tool.

The safety issues that should be assessed, including and in addition to the highway accident statistics, should consider the potential for development-related or other transport accidents in the vicinity of the site; and perception of personal insecurity in and around the development site.

The environment issues that should be assessed include:

- nuisance caused by transport-related noise and vibration generated by the development;
- the emission of greenhouse gases as a result of the transport implications of the development and the impact of changes in local air quality;
- the transport-related impacts on areas of designated landscape importance;
- whether the site is in an air quality management zone or likely to cause a breach of current legislation;
- the transport-related impact on areas of nature conservation, biodiversity and earth heritage interests (such as geology) where they interact with roads;
- the heritage of historic resources where they interact with development-generated transport and/or proposed mitigation measures;
- the transport-related impact on the townscape;
- appraisal of the transport-related impacts on the water environment;
- the impact of the transport implications on physical fitness;
- journey ambience.

Waterways development

It is agreed that Barrow Hill is isolated from neighbouring communities and from their services. DCC's Countryside Service would be willing to contribute with officer time towards the aim of improving the range of facilities available within walking distance of the village through the upgrading and possible expansion of paths and trails in the area.

Potentially Section 106's/the Community Infrastructure Levy could be used where appropriate to enhance these connections. In addition, subsequent Reserved Matter submission could respond proactively to these requirements by creating these connections in further application details.

Involvement at the early stages of development in order to maximise the opportunity to include off road walking routes connecting the village, places of employment and services would be welcomed.

The Chesterfield Canal makes a unique contribution to tourism and its inclusion in the economy section on page 14 is welcomed. Development such as that described in the AAP is unlikely to be detrimental to the Canal and its environs and may be beneficial, provided that facilities are protected and are an integral part of the whole package.

While significant local effort has restored Chesterfield Canal, this has created a barrier to movement travelling north and south. It is agreed that a number of footpaths need improvement that lead from the Canal, or the Trans Pennine Trail (TPT), to the communities on either side. It is hoped that, with the increased demand created by the proposals, opportunities will arise to expand and enhance

the north-south access routes. This should be seen as an ideal opportunity to use any planning gain resulting from this development.

The TPT is a popular and well used facility used by walkers, cyclists and horse riding for recreation as well as journeys to work or school. At peak times it can become extremely busy, and the promotion of further integrated foot and cycle routes in the area would therefore be welcomed. Routes associated with the spine road could be considered as separate from the road. The appropriate development of the River Rother 'riverside' path for good quality access through the development would be welcomed.

The requirement for monitoring to inform demand management measures is noted. It is requested that the Trans-Pennine Trail and canal towpath are included in both the study and any subsequent solutions.

It is hoped that the majority of new wildlife habitats would be retained and improved in any green spaces designed into the development. Should a loss of biodiversity be anticipated, particularly where this impacts upon features owned or managed by DCC, it is requested that mitigation in the form of direct habitat improvement on at least a like-for-like basis is provided.

The canal should be included in any investigation of water management as there may be potential for the canal to store floodwater and reduce flashing in downstream water-courses, including the River Rother, by reducing and managing flow rates.

Where the geography is likely to change during development, investigations should be undertaken on any new possible outflows from the canal into the River Rother. DCC requests to be involved in these investigations.

The possibility for any micro-hydro proposals along the canal should be assessed, in particular where high water is being moderated by the canal and released to the River Rother upstream from generators. This is a large, high profile scheme, which could generate significant gains in terms of sustainability targets. The large scale adoption of effective green energy generation through the housing targets, especially on any affordable housing elements, should be encouraged with solar thermal/solar PV most likely to give the highest return.

As the route for the new spine road is unclear at this time, it is important that an appropriate officer from DCC's Countryside Service is made aware of, and is able to comment on, subsequent proposals.

With regard to the Character Areas on pages 27-36:

- Works Road: development which enhances leisure and commercial potential is welcome; in particular a wharf with businesses such as

chandlery or boat repair/fitting would be a welcome addition to local business and the canal-side environment. Other types of commercial activity in keeping with the character of the canal would be supported.

- Lagoon: a suitable extension to the Bluebank Pools Local Nature Reserve with the long-term support of developers would be welcomed.
- Hall Lane: this section describes a "...open and low-lying land around the River Rother and Chesterfield Canal to the south of the Goyt's...", however its location is unclear and therefore further clarification is requested.

DCC is named as a lead Body in the Delivery Plan, and a significant area of the AAP area is owned and managed by the Countryside Service. It is therefore requested that an officer from this Service is involved in any high level Infrastructure Delivery design.

I hope that the above officer comments are helpful as you progress the AAP. If you have any questions regarding the comments in this letter, please do not hesitate to contact me.

Yours sincerely

A black rectangular redaction box covering the signature of Ian Goldstraw.

Ian Goldstraw
Planner