Dear Mr Spencer and Mr Bowker,

**INSPECTORS’ INITIAL LETTER TO THE COUNCIL (EX.INS.001 AND EX.INS.002)**

Please find below the responses of Chesterfield Borough to your Initial observations on the Chesterfield Local Plan. I have taken each issue in turn, in the order set out in your letter.

**Duty to Co-operate**

The Sheffield City Region (SCR) Statement of Common Ground was prepared jointly by the nine SCR Local Planning Authorities (LPAs) and was reported to SCR’s Infrastructure and Housing Boards on 9th and 17th July 2019 respectively. The Statement is now with the LPAs for their formal endorsement before it is reported back to the SCR Combined Authority for final approval in September 2019. The draft version endorsed by the SCR boards is attached with this letter.

The incorrect version of the North Derbyshire and Bassetlaw HMA SOCG was uploaded to the website. The correct version, signed by all of the District and County Councils (this is the only difference) is attached.

Statements of Common Ground are attached that have now been signed with Derbyshire County Council regarding Transport Evidence and Education.

The Statement on Flood Risk has now been signed by the Environment Agency, Derbyshire County Council and Chesterfield Borough Council and is also attached.
The Statements of Common Ground will be added to the Examination Website.

**Plan Period**

The Council notes the comments regarding the plan period. We are already developing our more detailed response to this, as set out in the Housing Topic Paper, and it will also cover other relevant areas of the plan. This will be brought forward as a series of proposed main modifications to the plan.

**Housing Need/Requirement**

The council’s approach to objectively assessed housing need (OAN) has been discussed with wider LPAs through the North Derbyshire and Bassetlaw HMA Local Plan Liaison meetings. Bolsover District and North East Derbyshire District’s Local Plans were submitted and examined on the basis the 2017 SHMA under transitional arrangements and the use by CBC remains consistent with this.

That said, the council is undertaking work to understand the potential consequences of using the LHN figure as the starting point for housing need and what adjustments to the LHN base may be required as a result of current evidence on need.

This is to be discussed at the next meeting of the North Derbyshire and Bassetlaw HMA Local Plan Liaison Group in August. The draft SCR statement of Common Ground demonstrates that, on the basis of LHN alone, there would be no concerns over meeting housing targets across the wider Sheffield City Region.

**Habitats Regulation Assessment (HRA)**

Copies of the Natural England correspondence have now been provided (email from Antony Wallace dated 31st July 2019).

The practicalities and responsibilities for SAC/SPA monitoring is on the agenda for the next HMA Local Plan Liaison meeting being organised between Chesterfield Borough, Bolsover, North East Derbyshire and Bassetlaw Districts, and Derbyshire County Council. A letter has been drafted and agreed with our SA/HRA consultants (Wood Group) that we will be shortly sending out to relevant authorities (North East Derbyshire District, Sheffield City, Derbyshire Dales District, Peak District National Park Authority) to request a meeting to discuss joint monitoring.
Sites

A map of the location of the Chatsworth Corridor will be provided shortly.

The approach the council has taken to Heritage Impact Appraisals (HIAs) was agreed with Historic England and is set out in the LAA Stage 2b Site Assessment (Key Supporting Document KSD16) at paragraph 4.23:

“In addition to this approach, following guidance from Historic England, a Heritage Impact Assessment will be undertaken for all sites which scored 2 or 3 in the Designated Sites category, and/or were categorised as Amber by the DCC Archaeologist and/or Conservation Officer. The HIA methodology and proforma have been agreed with Historic England. Planning Officers will complete the assessments based on the advice from DCC Archaeology and the Borough’s Conservation Officer where available.”

The Heritage Assets taken into consideration for each site assessed are set out in the plans accompanying each Assessment, contained in the Heritage Impact Assessments 2019 document (Key Document KSD22).

Separate HIAs for the Strategic Sites. Sites SS3 (Chesterfield Waterside and the Potteries) and SS4 (Markham Vale) have the benefit of extant planning permissions that were the subject of Environmental Impact Assessments that took included consideration of the Heritage Impact of the developments at the time the applications were determined. Sites SS1, SS2, SS5 and SS6 have been the subject of ongoing assessment as part of the preparation of masterplans/planning applications; however HIAs will be produced for these sites summarising the impacts of these proposals and provided as soon as they can be made available.

The site appraisals for allocations are set out in the council’s Site Allocations Conclusion Document (Key Supporting Document KSD23). As some of the Strategic Sites consist of more than one LAA site some of the appraisals cover multiple sites. The summaries for the sites assessed through this process are as follows:

**SS2 – Chatsworth Road Corridor:** Specific allocations within this corridor are the Walton Works site covered by site 63 (page 32, allocated as Housing Site H30 under policy LP4).

**SS3 – Chesterfield Waterside and the Potteries:** Site 68 (page 34) – this allocation is also based upon an existing outline planning application and subsequent reserved matters approvals.
SS5 – Staveley and Rother Valley Corridor: Sites 310, 311 and 312 (pages 108 to 110).

SS6 – Land at Dunston: Sites 293, 294 and 295 (pages 100 to 102).

Three of the Strategic Sites were not drawn from the LAA based site assessments but are instead drawn from the council’s Town Centre Masterplan and an existing outline planning permission for the Markham Vale Employment Growth Zone, as follows:

SS1 – Chesterfield Town Centre: This policy is a broad policy for development and regeneration within Chesterfield Town Centre (within the area identified on the Submission Policies Map). It is derived from the proposals within the existing Chesterfield Town Centre Masterplan (Evidence Base Documents EV32a to EV32d).

SS4 – Markham Vale: this allocation is based upon an existing outline planning permission that is being implemented in phases and does not have a separate assessment.

SS7 – Chesterfield Railway Station: this policy does not include specific allocations of land use (other than the route of the Hollis Lane Link Road, covered by policy LP24 – ‘Major Transport Infrastructure’). It forms a broad development area in the council’s Town Centre Masterplan (Evidence Base Documents EV32a to EV32d). A more detailed masterplan is being prepared for this area in connection with the council’s work on the East Midlands response to HS2 and it is intended to publish this for further consultation in the autumn of 2019.

A copy of the Council’s Community Infrastructure Levy Regulation 123 list has now been uploaded onto the examination library.

Main and Additional Modifications and Modifications to the Policies Map

I can confirm that the council will be keeping a clear record of possible main and additional modifications throughout the examination and will present these for consideration at the relevant time.

Examination Guidance

A link has now been added on the Examination web page to the updated Procedure Guide for Local Plan Examinations.
I trust that the above addresses the issues that were raised in your letter, however we will of course provide any further clarification or information required.

Yours sincerely,

Alan Morey
Strategic Planning and Key Sites Manager

Attachments

Statement of Common Ground on Education
Statement of Common Ground on Transport
Statement of Common Ground on Flood Risk
Draft Sheffield City Region Statement of Common Ground