

29-01-18

Dear Mr. Matheson

We have considered the queries which arose from your reading of the Doveridge Neighbourhood Plan or from representations received and below, in blue script, are our responses. We hope you will find them helpful in addressing some of the issues which you raised. If there are any further queries please do not hesitate to contact us.

Kind regards

Jackie Dew

pp Doveridge Parish Council Neighbourhood Plan Steering Group

- Policy R1 appears to be problematic in that it limits development within the Settlement Boundary (now defined in Policy S2 of the new Local Plan) to "small infill sites of 2 residential units or less". Within the text you note that strategic sites have been identified and included within the Settlement Boundary through the Local Plan 2013-2033 but the Neighbourhood Plan Policy appears not to acknowledge the strategic sites and to severely restrict the size of and therefore scope for new permissions. As a representation has pointed out, you do not provide evidence, compelling or otherwise, which would justify the local restriction now proposed. Infill development is addressed in Local Plan Policy S3 and *inter alia* this reassures that every proposed development must be "of a scale, density, layout and design that is compatible with the character, appearance and amenity of the part of the settlement in which it would be located"; those constraints would apply equally to strategic sites and ones of 2 residential units or less. The Neighbourhood Plan text suggests that "[a]voiding the appearance of over development means that development is likely to comprise two residential units or less" but this is conjecture not evidence; in fact if a plot in line with neighbouring densities could accommodate 4 dwellings then restricting it to 2 would seem to countermand the encouragement of small dwellings that you indicate are needed. It would appear that Local Plan Policy S3, particularly when combined with the Neighbourhood Plan Policy D1, provides a clear basis for addressing "over development" without any arbitrary distinctions based on numbers of units. Do you have any comments on my line of thinking here?

Settlement Boundary

The Settlement Boundary shown in Illustration "Settlement Boundary 2016" and the Strategic Housing Sites in the Emerging Local Plan 2016 will accommodate housing development to meet local need in Doveridge. Growth within the parish of Doveridge has taken place primarily within the settlement boundary. The adopted Local Plan 2005 Settlement Framework Boundary for Doveridge covers a smaller area than the current Settlement Boundary, following closely around the built form of the village.

The amended Settlement Boundary in this neighbourhood plan encompasses land outside of the previous village envelope and incorporates the local plan's strategic sites. The neighbourhood plan seeks to align with Derbyshire Dales District Council in encouraging future growth and development to be located within the settlement boundary. This is to promote a sustainable community, meeting the housing needs of the area whilst ensuring the existing settlement and its community facilities and services are made more viable, and preventing urban sprawl into the rural area.

Strategic sites

Strategic sites in Doveridge are acknowledged in the N.Plan Housing Rationale and Evidence page 42 para 1.

Infill

The purpose of Policy R1 is to provide and promote growth opportunities for small-scale development within the Settlement Boundary and enable a sustainable mixture of development opportunities. Development proposals on sites in locations outside the Settlement Boundary will be assessed against criteria defined in Policy D1 and in relevant policies in the Derbyshire Dales Local Plan.

In Application of Policy R1 second para on page 38 the word 'likely' is used rather than a mandatory term when talking about the appearance of over development in Doveridge: thus we considered two units to be a recommendation rather than an absolute, limiting future development.

We are mindful of the recommendation by DDDC that the deletion of the reference to two units would benefit this policy and we can understand the rationale behind this suggestion.

- Policy D1: The NPPF says that policies should "provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency" (NPPF para 17) With this in mind the use in bullet point 5 of the phrase "other measures to reduce car dependency" is unclear as to its expectation (is that perhaps the purpose of Policy T1?); also in bullet point 7 I wonder whether requiring "a locally inspired *or* distinctive character" (my emphasis added in italics) may not confuse if you are looking for developments that "integrate well"? Similarly, NPPF para 60 adds (with my emphasis added in *italics*): "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through *unsubstantiated* requirements to conform to certain development forms or styles"; it is unclear in bullet point 11 how "avoiding placing fenced off rear gardens adjacent to public highways" might serve the basic design expectation to "clearly distinguish between public and private spaces" (but I

do note that more insight into the line of thinking may be included alongside Policy NE1). Your comments are invited on my line of thinking here.

Policy D1

Bullet point 5. Could be changed to 'other measures to reduce car dependency as set out in Policy T1 e.g. walking, cycling.'

Bullet point 7. We feel that 'locally inspired' or 'distinctive' could be changed to 'create a place with a locally inspired character which integrates well within Doveridge'.

Bullet point 11. We do agree there may be some lack of clarity here. To prevent the urbanisation of larger developments within Doveridge we seek a variety of boundaries, as already exist in the Village, instead of a uniform standardised form i.e. fences. Natural surveillance issues and safety are also considerations.

- Policy H1: The text - and a representation - acknowledges that a significant part of the content of this Policy has now been overtaken, but not contradicted, by the adoption of the Local Plan. In fact it would appear that Policy H1 adds no local detail beyond Local Plan Policy HC11 but local emphases are explained and substantiated in the text.

Policy H1

We thought we were bridging the gap before adoption of the Local Plan as Doveridge was already under threat of large development at the time. We do feel that the local emphases contained and substantiated within the text of this policy reinforces Local Plan Policy HC11.

- Policy BE1: The Local Plan context for this Policy is provided by Policies EC1 and S4. The Local Plan policies positively detail what will be acceptable (without ignoring the constraints) whereas Policy BE1 is very generalised in its encouragement but very specific about obstacles (which are not peculiar to Doveridge) - "noise, disturbance, air pollution, traffic movement, visual impacts, dust, vibrations and other impacts". No specific development opportunities - locations or types - are identified for the Neighbourhood Area. It is important that the Neighbourhood Plan and Local Plan policies should dovetail with clarity if prospective entrepreneurs are to be attracted and not confused. Your comments are invited on the coverage of this topic in the Local Plan and the Neighbourhood Plan when considered together.

Policy BE1

Whilst we acknowledge these are not specific to the NP area the test would be appropriate given the density and compact nature of the settlement. DDDC do not provide such a clear test.

- Policy BE2: As written this Policy is about the delivery of a national broadband policy with no specific land use content; developers would have reason to argue that they are in the hands of the telecoms providers to deliver the connectivity requirements. You include as Appendix B the input from Digital Derbyshire and I would suggest that there is a community project to monitor and sustain pressure on the providers rather than appear through Policy BE2 to use prospective developers as an intermediary in the process. I note that Local Plan Policies S10 and EC1 address this issue in a more measured way. Your comments are invited on my line of thinking here.

Policy BE2

Developers can lay the cables themselves and fund the cost, rather than waiting for BT or the national roll out. We are trying to encourage homeworking and reduce car journeys so an even supply of good fast broadband is critical to a rural community.

We note that lots of other Neighbourhood Plans in rural areas are making this point and including a similar policy.

- Policy BE3: It is difficult to conceive of a home-working proposal that would be significant enough to require a planning consent and yet will have "no adverse impact on residential amenities"; that is not a realistic benchmark. In such circumstances the planning considerations seek to weigh the benefits and the adverse factors together to see whether a favourable balance can be achieved. The wording of Policy BE3 would therefore need to reflect such an approach. Do you have any comments on my line of thinking here?

Policy BE3

On reflection we feel the term 'homeworking' could be changed to 'home based businesses'. There are current examples of home based businesses within Doveridge which may indeed require planning permission such as a cattery and an animal sanctuary. We could predict future home based businesses which would require planning permission such as a day nursery.

- Policy CF1: The wording here is confused with an unnecessary repetition of "planning permission" in the first sentence and an "exception" referred to in the third sentence without clarity on to what the exception applies; further the Policy refers to the protection of "community assets" but not even in the supporting text are these identified as such (on p25 the map illustrates "Local Services" and on p54 it is noted that applications for designation where relevant have yet to be made). If Policy CF1 is to add local detail to the related Local Plan provision then there needs to be clarity *within the Policy* as to what facilities are being included. Accordingly I would appreciate a

specific list of community facilities that can be justified as being the subject of Policy CF1. I note that the Local Plan only affords a protection "until all possible options have been explored" and any policy must acknowledge that financial viability is a consideration.

Policy CF1

We agree that there is repetition of 'planning permission' and would therefore begin the first sentence of the policy as follows, 'Development likely to have----'

On reflection we feel that the third sentence beginning 'An exception' could be deleted.

We agree that a list of Community facilities would add local detail to policy CF1

- Primary School
- Abbotsholme School
- Playgroup
- Church
- Village Hall
- Village Club
- Village Pub
- Coffee Shop
- Shop/ Post Office
- Care Homes
- Playground
- Playing field
- Tennis courts
- Allotments
- Bowls Club
- Shooting Club

We agree that a sentence should be added acknowledging that financial viability would be a consideration and that protection is only afforded 'until all possible options have been explored', in order to be in convergence with the Local Plan

- Policy T1: As is acknowledged within the text, this Policy will need to operate alongside Local Plan Policies HC18 - 21. As noted above, policies should "provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency" (NPPF para 17). Policy T1 uses the terms "mixed approach to parking", "some choice and variety [for different household requirements]" and "green travel plan", but none of these is used or defined in the Local Plan and there is therefore an implication that differences of approach are being sought for Doveridge. I doubt this is in fact the intention since 'sustainability' is at their core, but

certainly no evidence has been provided for any additional requirements and clarity is lacking. Your comments are invited on the coverage of this topic in the Local Plan and the Neighbourhood Plan when considered together.

Policy T1

As stated in policy HC18 page 97 of the Local Plan it is our aim to ensure that highway and transport problems are not created as a result of new development in Doveridge

New Developments should not exacerbate the existing, acknowledged problem with on street parking within Doveridge, to the detriment of safe and efficient movement throughout roads in the village. The only bus service has recently had to be re-routed to the perimeter of the village because buses could not move freely through the main street. This has resulted in a much longer walk to the new bus stops for most elderly residents in the village.

We want to be in strategic conformity with the local plan and therefore have not included proscriptive numbers re parking. We would however be seeking from developers details of proposed parking provisions, based on the needs of the new development but also ensuring minimal impact on the transport network throughout Doveridge.

We agree that to ensure complete conformity with the Local Plan the word 'green' should be removed from the phrase 'green travel plan'.

- Policy NE1: There appears to be some unnecessary overlap with Policy D1; the heading here is "Natural Environment" and so that is solely what the policy content should address. The phrase "Development ...will be approved where it does not have any significant adverse impacts on the natural environment" fails to acknowledge that many other considerations will apply. The more straightforward approach is to give a positive steer that "Development proposals must consider, assess and address, with mitigation where appropriate, their impact on:". A representation suggests that the reference to "same species" might helpfully be replaced by "appropriate indigenous species". It is perhaps surprising that neither the text nor Policy cross-refer to the map produced especially for the Parish Council by the Derbyshire Wildlife Trust (although the referencing system used on the map is unexplained). Do you have any comments on the lines of thinking here?

Policy NE1

We would suggest adding to the first sentence in Policy NE1; "Many of the major natural assets are shown on the map produced by Derbyshire Wildlife Trust on pages 56-57".

No explanation was sent with the map but we do include a commentary.

We agree that asking for replacement hedgerows and trees to be of the same species and type may

be a little prescriptive and could possibly be replaced by 'appropriate indigenous species'.

After consideration we agree that the second sentence in Policy NE1: Natural Environment, could be changed to acknowledge the many considerations that will apply when determining the adverse impacts any future developments may make on the natural environment. The sentence could read: "Development proposals must consider, assess and address, with mitigation where appropriate, their impact on the Natural Environment."

- Appendices: I am doubtful that the inclusion of selected consultation responses within the Plan document is warranted since you have considered *all* responses together in arriving at your submission document and some may be superseded within the Regulation 16 consultation. Since the Plan will commonly be accessed via the internet the referencing of evidence ought to include, wherever possible, the website address of the relevant documents. Do you have any comments on my lines of thinking here?

Appendices

We agree that the appendices relating to Digital Derbyshire, Seven Trent and Highways England, could be removed from the Plan document since these have been considered in the submission document.

We agree that adding the web site addresses of relevant evidence documents may be appropriate to facilitate access via the internet.