



DERBYSHIRE DALES DISTRICT COUNCIL

RESPONSE TO

**INSPECTOR'S PRELIMINARY QUESTIONS,
CLARIFICATION AND COMMENTS RELATING TO
SOUNDNESS (Implementation and Monitoring – Chapter
9 and Appendices)**

DERBYSHIRE DALES LOCAL PLAN EXAMINATION

INSPECTOR'S PRELIMINARY QUESTIONS, CLARIFICATION AND COMMENTS RELATING TO SOUNDNESS (Implementation and Monitoring – Chapter 9 and Appendices)

Introduction

1. The purpose of this note is to seek clarification from the Council on a number of matters relating to Chapter 9 of the Local Plan and the Appendices. These matters have emerged from my preparation so far, including assessing representations.

Implementation and Monitoring

2. Paragraph 9.2 implies that there will be further development plan documents but the assumption was that this document is the sole local plan for the district. If the reference is intended to refer to reviews of the Plan then this should be made clear.

District Council Response

The District Council anticipates that future revisions to the Local Plan will come forward through a Local Plan review. It is not the intention of the District Council to produce any further Development Plan Documents. The District Council will prepare a modification prior to commencement of the hearing sessions in order to clarify this point.

The District Council also note the Inspectors similar comments in IN02 (Paragraph 22) - "*On page 1 it would be useful to confirm the scope of the LP in the sense that it will be the sole LP for the District as supported by paragraph 153 of the Framework and there is not an intention to produce any additional development plan documents other than any Neighbourhood Plans that might come forward.*"

In response to this comment, the District Council will be suggesting modifications to confirm the scope of the Local Plan on page one and further clarification that it is not intended to produce any additional development plan documents.

3. The column titles in Table 7 are not consistent. It is assumed that those included on the 1st page of the table should be carried through to the remaining pages. The table will need to be adjusted to take into account any Modifications to policies.

District Council Response

This is a typographical error. The District Council will prepare a modification prior to commencement of the hearing sessions. The District Council will also adjust the table to take account of modifications to policies.

4. In terms of Table 8 indicators and targets should be specific and measurable. Are the Council satisfied that this is the case?

District Council Response

The District Council is satisfied that the indicators identified in Table 8 are both reasonable and specific and can be practically used to measure the implementation of policies in the Local Plan. However, the District Council is prepared to review the indicators and targets should the Inspector consider this to be necessary.

5. I have some detailed comments on Table 8 at this stage but more comments are likely to arise as the examination proceeds:
 - a. The target for Policy S3 does not appear to be challenging in that significantly more development should take place in higher tier settlements.

District Council Response

The Inspectors comments are noted. The target for Policy S3 intends to measure the differentiated rate of development between the settlements in the hierarchy ensuring the implementation of the Policy reflects the Policy intent.

However, in order to make this target more specific, the monitoring indicator could be 'number of planning applications approved for dwellings outside higher tier settlements (Tiers 1, 2 and 3)'. The target could be set to 'annually reduce the number of approvals for residential development in tiers 4 and 5'.

The District Council will prepare a modification prior to commencement of the hearing sessions in order to clarify this point.

- b. The indicators and targets for Policies S8, S9 and S10 do not line up.

District Council Response

The District Council assumes the Inspector is referring to matters of presentation as opposed to the content. In regard to presentation, this is a typesetting matter which the District Council will amend.

In regard to content, the District Council consider the indicators and targets for Policies S8 and S9 to be aligned. The indicators and targets for Policy S10 are different from Policies S8 and S9; this is intentional to reflect the differentiated policy approach to the Rural Parishes Development Strategy. However, the absence of an employment indicator and related target is noted and the District Council will prepare a modification prior to commencement of the hearing sessions in order to address this point.

- c. The indicator for Policy PD5 should refer to PD5 not PD1.

District Council Response

This is a typographical error. The District Council will prepare a modification prior to commencement of the hearing sessions.

- d. The indicator for PD9 should refer to pollution and unstable land not flooding and water quality.

District Council Response

The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

- e. The targets for Policies HC3, HC12, HC17, HC18, EC5 and EC10 remain 'to be determined'.

District Council Response

Policy HC3 – In response to the Inspectors previous questions on this policy (EX/06 – Q7), the District Council set out the reasons why no specific target has been set within the Local Plan for self-build developments. Whilst the number of self-build developments can easily be monitored through annual housing land availability assessments and planning permissions granted, no specific target is proposed.

Policy HC12 - The District Council propose that the target should be to increase the amount of accommodation available for older people to help sustain their independence. The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

Policy HC17 - The District Council propose that the target should be to ensure that there is no net reduction in the provision of sports, cultural, leisure and recreational facilities during the plan period. The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

Policy HC18 - The District Council propose that the target should be to increase the number of residential developments that are served by public transport services during the plan period. The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

Policy EC5 – The District Council propose that the target should be to enable the redevelopment of all Industrial Legacy sites during the plan period. The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

Policy EC10 - The District Council propose that the target should be to increase the number of farm diversification schemes approved during the plan period. The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

- f. The target for Policy EC2 needs to be updated to refer to the 2013-2033 plan period.

District Council Response

The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

- g. The indicator for Policy EC9 should refer to Policy EC9 not EC10.

District Council Response

The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

Appendices

- 6. Should the Glossary refer to LEP and S106 obligations?

District Council Response

The District Council consider that the Glossary should include a reference to the LEP and S106 obligations. The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

- 7. The definition of major development needs to be updated to reflect the 2015 Development Management Procedure Order.

District Council Response

The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

- 8. The definition of Rural Exception Sites is not consistent with Policy HC5 which enables open market housing in exceptional circumstances.

District Council Response

The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

- 9. Comments on, and questions about, the Housing Trajectory (Appendix 3) were made in Preliminary Questions (1) dated 7 February.

District Council Response

The District Council refer the Inspector to the comments made in EX/02 (Question 12).

10. The font sizes for 'Accessible Settlements with Minimal Facilities' are not consistent in the Key Diagram at Appendix 4.

District Council Response

The District Council will prepare a modification prior to commencement of the hearing sessions to address this point.

Response

11. It would be helpful to have a response from the Council on matters raised above by 2 March if possible. If the Council consider that any of the above comments and questions need to be addressed by Main Modifications (MMs) then please let me know. In this respect as advised in the Initial Questions a Schedule of MMs should be produced at an appropriate stage in advance of the hearings.
12. I am not inviting comments from other parties at this stage. I want to clarify the Council's position first. This will help me set out pre-hearing questions in due course on which all parties with relevant representations will have the opportunity to respond.

Mark Dakeyne

INSPECTOR

15 February 2017