

# **SOUTH DERBYSHIRE DISTRICT COUNCIL**

## **Regulation 14 Consultation:**

### **Hilton, Marston and Hoon Neighbourhood Development Plan – Draft Plan**

#### **Consultation feedback from SDDC, NDP group comments on feedback, and actions taken**

#### **General comment**

The plan period needs to be clarified and stated within the Plan itself: Page 13 of the Plan states that residents were given the opportunity to express their opinion for housing delivery for the period 2028 to 2035, however the Plan does not specifically set out the plan period. The AECOM Housing Needs Assessment states that the Neighbourhood Development Plan (NDP) period is 2016 – 2035, therefore the comments below are made on this basis.

***Action: Plan period to be put on front cover.***

#### **Policy H1**

The Hilton (South Derbyshire) Housing Needs Assessment (HNA) – June 2019 states that the Housing Needs Figure over the plan period (2016 -2035) is 839 dwellings for the Neighbourhood Area.

The HNA references housing completions within the neighbourhood plan area from 1 April 2011 to 31 March 2017. South Derbyshire's Local Plan (from hereon called the Local Plan) allocates two housing sites within the Neighbourhood Area, Land at Hilton Depot (Policy H7) for 485 dwellings and Derby Road, Hilton (Policy H23C) for around 43 dwellings. By the end of March 2017, 35 dwellings had been completed on housing allocation H7; Derby Road (H23C) has consent for 45 dwellings.

Whilst the draft Hilton NDP allocates two sites to include housing, H1A and H1B, these proposed allocations, taken together with the two Local Plan housing allocations, will not provide sufficient housing to meet the identified need of 839 dwellings by 2035 set out in the HNA. Subtracting the 45 new build completions during 2016/17 leaves 794 dwellings needed in the NA by 31 March 2035. Subtract the 8 dwellings proposed by draft policy H1B, the 45 dwellings permitted at H23C, and remainder of the H7 Local Plan allocation and the residual need is 291 dwellings, which will clearly be in excess of what would come forward on the proposed H1A allocation. If the above calculation is worked through using the 57 dwellings currently proposed by way of a planning application on H1B (Lucas Lane), the unmet need figure drops to 242 dwellings.

The National Planning Policy Framework states at paragraph 13 that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”* Basic condition (d) as highlighted in the Planning Practice Guidance requires that *“the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.”* For the Hilton NDP to extend beyond the Local Plan period requires the NDP to meet the identified housing need for that period in order for it to be fit for purpose and comply with the basic conditions.

A further basic condition, basic condition (e), requires that any NDP must be in general conformity with the strategic policies of the development plan. The draft NDP policy H1 restricts new residential development to that which has been allocated within the Local Plan, proposed allocations H1A and H1B or is a brownfield site within the settlement boundary (defined in the Local Plan). However, policies H1 and SDT1 of the Local Plan, both strategic policies, allow greenfield development within settlement boundaries (subject to other Local Plan policies) and Policy H1 allows exception or cross-subsidy sites up to 25 dwellings outside of settlement boundaries within Key Service Villages, of which Hilton is one. Exception or cross-subsidy sites can be located on greenfield land. As such, draft NDP policy H1 is not in general conformity with the Local Plan's strategic policies.

**Comment:** The NPSG did not consider the Housing Needs Assessment of AECOM to meet the requirement of paragraph 14 of the NPPF in providing 'objectively assessed needs'. It is also noted that in their comments, SDDC have not included the development for 34 dwellings that are currently under construction on the site known as the Mandarin. The NPSG reviewed their proposed policies against Paragraph 13 of the NPPF and concluded that they did meet the test of sustainable development.

It is stated that policy SDT1 is strategic, although it is noted that in Local Plan part 2, it is described as a Development Management policy. The NPSG reviewed their proposed policies against the strategic policies of the Local Plan and did not believe there was any conflict.

The NPSG decided to remain with their own objectively assessed housing needs.

**Action: No action**

### **Policy H1A**

Policy H1A requires the provision of specialist accommodation along with retail units. The National Planning Practice Guidance for Neighbourhood Planning states:

*"Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy. Further [guidance on viability](#) is available."* Paragraph: 005 Reference ID: 41005-20190509.

Draft policy H1A requires a minimum of 10 and maximum of 20 sheltered bungalows to be built on the Mease site. It is unclear whether these bungalows are required as affordable dwellings or whether they are for the private sector. Demand for sheltered bungalows within the existing Council stock has reached equilibrium; a small number of bungalows within developments may be supported on sites, but 20 in one locality would be difficult to let if they were a rented product.

The Independent Examiner appointed to examine the NDP may query the viability of the proposed policy, to ensure that the policy is realistic, together with the basis for the specifying of a minimum of seven ground floor units.

The requirement of a minimum of 25% of sheltered bungalows complying to M4 (3) standard, goes beyond the requirements of building regulations and would require viability testing. The emerging Strategic Housing Market Assessment for the District would indicate that this percentage is too high; the evidence will recommend 5-10% where viable.

With regard to the residential care home of up to 40 beds, this is contrary to the Derbyshire Accommodation Strategy, adopted by the Council's Housing Committee, which shows an oversupply of care homes within the District. It appears that the NDP bases the need for the residential care home on the neighbourhood survey, however the evidence from AECOM's HNA shows a need for specialist accommodation, including sheltered housing and extra care, with no mention of a need for care home placements. **So?** Evidence suggests a need for 77 units of specialist accommodation (sheltered and extra-care) but notes this does not need to be within the Neighbourhood Area.

It should be noted that whilst the HNA sets out that affordable housing split includes entry level market homes, starter homes and entry level market rent, these are not in line with the Affordable Housing SPD which only supports affordable/social rent and shared ownership.

**Comment:** The comments by SDDC are not understood in the context of bungalows within the Designated Area. The last sheltered housing bungalows built in Hilton were 24 in the 1960's when the population of Hilton was a fraction of what it is today. The partially quoted paragraph above also states: "Plans should be prepared positively, in a way that is aspirational but deliverable". The NPSG believe this to be the case.

For the avoidance of doubt, the flats proposed are not ground floor units.

The policy on M4(3) standard bungalows was derived from the County Council policy.

The comment on care homes appeared confusing. On the day of writing these comments the care homes in South Derbyshire had an occupancy of 93%. The projection produced by the NPSG appears more realistic and supports the policy on care homes.

**Action: No action**

### **Policy H1B**

The draft NDP policy H1B requires a low density housing development of up to 8 dwellings along with the provision of allotments, a community orchard, woodland and a community farm based on the existing farm buildings. The National Planning Policy Framework states that planning policies should "*support development that makes efficient use of land*" taking into account a list of criteria (paragraph 122). The current planning application on the Lucas Lane site is for up to 57 dwellings and it is queried therefore whether the density proposed in Policy H1B is the most appropriate for the site in question.

**Comment:** The NPSG believes the proposed use of the Lucas Lane site in the draft Plan meets paragraph 122 of the NPPF as it is protecting a community asset and providing amenities that have been previously overlooked, but identified as a need from the residents.

**Action: No action**

### **Policy H2: Housing Mix**

Page 55 of the HNA states: *“Currently, the supply of homes in terms of size and demand for homes are in broad alignment. However, due to significant demographic shifts that are forecast over the Plan period, an appropriate policy response is needed to support the delivery of smaller dwellings of 2-3 habitable rooms.”* Therefore the evidence in the HNA does not appear to support the proposed policy.

The need to focus on delivering 2-3 bedroom homes is strengthened by the evidence found in the Hilton Area Neighbourhood Development Plan survey. Furthermore, a greater focus is needed on delivering 1-bedroom homes, although the majority of homes delivered should still be 2 or 3 bedroom homes. An appropriate housing split, as supported by the HNA, would be as follows:

1 bedroom: 10%

2 bedrooms: 30%

3 bedrooms: 50%

4+ bedrooms: 10%”

As drafted, policy H2 provides a different housing split to that recommended in the HNA. The difference in approach will need to be justified, particularly the percentage of 4+ bedrooms proposed within the policy compared to that within the HNA. Similarly, the expectation that 25% of all housing developments of five or more should be bungalows needs to be justified.

**Action: the mix was reviewed and the NPSG agreed a new mix as in the draft Plan**

### **Policy H3: Requirements of housing: Residential car parking**

The policy goes beyond the requirements of the Local Plan and 6C's Design Guide standards.

**Comment:** It is noted that this policy is supported by the County Council

**Action: No action**

### **Policy T1: Active Travel**

A suggestion for strengthening this policy would be: New development should, where available, link up to existing walking and cycling routes and public transport.

**Action: Agreed**

### **Policy T2: Access to schools**

Is the intention for this policy to apply to *all* new developments, or all new *housing* developments?

**Action:** *Agreed to clarify to apply to 'housing'.*

#### **Policy E1: Green Spaces**

As drafted, policy E1 is not in conformity with Policy BNE8 in the Local Plan, nor the emerging Local Plan policies in the Local Green Spaces Plan. These Local Plan policies, together with the NPPF, do not restrict all development within Local Green Spaces.

It is unclear whether the second sentence of policy E1 is in regard to Local Green Spaces or referring to all new development outside of Green Spaces.

**Comment:** It is noted that the NPPF states that Local Green Spaces should endure beyond the end of plans.

**Action:** *Agreed to bring the policy into conformity with BNE8 and to clarify as suggested.*

#### **Policy E2: Retaining Village Identity**

The Local Plan contains policies detailing the circumstances in which development outside of settlement boundaries within Rural Areas will be granted.

#### **Policy E3: Community Land**

To which development proposals is this policy intended to apply? Perhaps the following policy wording would meet the NDP's intention: "The provision of community gardening, orchards and allotments will be supported."

**Action:** *Agreed. Amend as suggested.*

#### **Policy E5: Biodiversity**

The first two sentences of the policy appear to state the same requirement – no net loss of biodiversity.

The Hilton Nature Reserve is a SSSI; a nationally important site. Local Wildlife Sites are sites of County importance. Paragraph 175 of the NPPF sets out principles to be applied when determining applications where proposals could affect habitats and biodiversity.

**Action:** *Agreed. Amend to clarify.*

#### **Policy L1: Recreational facilities**

The requirement for infrastructure and developer contributions is set out within Policy INF1 of the Local Plan. The proposed policy L1 requires that developer contributions will be sought on new residential developments to fund sport and play facilities. South Derbyshire 'Section 106 Agreements: Guide for developers' requires that developer contributions will be sought from residential development exceeding 4 dwellings and sets out the amount of contribution required.

'Section 106 Agreements: Guide for developers' requires that contributions are collected for three types of recreation; open space, outdoor facilities and built facilities. It is not fully clear from drafted policy what type of contributions will be required. The first and last paragraph appears to differ in meaning; the first paragraph requires that developer contributions will be sought from new residential development to fund sport and play facilities, whereas the last paragraph states, "...provision for a range of outdoor activities and sports will be encouraged".

**Action: No action**

### **L2: Healthcare facilities**

The requirement for infrastructure and developer contributions is set out within Policy INF1 of the Local Plan. Proposed policy L2 requires that developer contributions will be sought "to improve the quality and accessibility of health and social facilities including integrated community health facilities". South Derbyshire 'Section 106 Agreements: Guide for developers' requires that developer contributions will be sought from residential development exceeding 4 dwellings. When this threshold has been met, the NHS Derby and Derbyshire Clinical Commissioning Group would then be consulted to establish the required contribution from the development.

Planning obligations can only be sought to assist in mitigating the impact of unacceptable development to make it acceptable in planning terms (PPG Planning Obligations Paragraph: 002 Reference ID: 23b-002-20190901). It would therefore be beyond the law to collect contributions from all development where proposals do not impact upon healthcare provision.

**Comment:** Noted but it is a given that all policies will comply with the law.

**Action: No action**

### **Policy L3: Hilton Village shopping centre development**

The specific policy requirements may hinder potential development opportunities. The developments supported by the policy can be supported in principle, thereby allowing, for example, for a retail proposal of six units.

**Comment:** For the avoidance of doubt, the policy is for 7 retail units.

### **Policy B1: Business Units**

The first sentence states the phrase "within the existing settlement area". Does this mean within the settlement boundary? It would be helpful to define to which B use classes is the policy intended to apply.

**Action: Agreed. Policy amended as suggested**

### **Policy B4: Broadband**

Suggested policy wording: Where practicable, new development should be supported by full fibre broadband connections.

**Action: Wording partially adopted**





Dear Ms Davies

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Hoon Neighbourhood Plan  
Your ref:  
Date: 6 December 2019

### **Localism Act 2011 – Strategic Planning Comments**

#### **Hilton, Marston on Dove & Hoon Neighbourhood Development Plan: Pre-Submission Draft**

Thank you for consulting Derbyshire County Council (DCC) on the Hilton, Marston on Dove & Hoon Neighbourhood Development Plan: Pre Submission Draft (HMoDHNP). The comments below are DCC's Member and Officers' technical comments with regard to the housing, transport, environment, leisure, education, business, and public health aspects of the Plan.

#### **Local Member Comments**

Councillor Julie Patten, the Local County Council Member for Hilton Electoral Division, has been consulted. To date, no comments have been received, but if I receive any I will forward them to you.

#### **Officer Comments General Policies and Community Policies**

DCC would suggest that the note on the back of the document explaining the difference between planning policies, which will be examined, and community policies, which will not, should appear in the introduction. This would facilitate understanding of the document.

***Action: Agreed***



### **Plan Period**

The HMoDHNP does not identify a plan period. This should be defined as it is fundamental to any projection of the development requirement. Page 13 of the 'Housing delivery' section makes reference to a survey for the delivery of housing for the period 2028 to 2035, a period commencing 8 years from now. DCC would suggest that a realistic plan period should be identified that is in accordance with the Local Plan.

***Action: Put the Plan period on the cover – same comment as SDDC. Leave the plan period as 2035 – this was on the advice of SDDC***

### **Housing Policy H1 Housing delivery**

This policy refers to the settlement framework identified in the Local Plan. The framework could be shown on an additional map, or alternatively clearly identified on the map on page 9, which shows the phases of housing development in Hilton. **OK?**

The supporting text to H1 refers to the rapid growth of Hilton since 2000 which has resulted in an imbalance in housing mix and an under-provision of services. There are independent shops, an Aldi, a Tesco express and a doctor's surgery in the 'village centre', but the development form is high density, more akin to suburbia than a village. Active travel to/from the existing facilities is not encouraged by the existing settlement layout.

The community survey results show a mix of opinions, with approximately 30% seeking no more growth but 20% wanting larger, 4/5 bed houses with gardens, matched by a similar demand for bungalows and sheltered housing. Two areas, 'The Mease' and 'Lucas Lane', have already been allocated for residential / mixed use development. DCC would suggest that policy elements H1A and H1B are very prescriptive; H1B is unlikely to be achievable given the size of the development – 8 dwellings.

***Action: Noted but H1B has to be seen in its entirety – no action***

### **Policy H2 Housing mix**

Policy H2 'Housing Mix' seeks a figure of 25% of all new development to be bungalows in order to address the historic imbalance of housing mix. Percentages are also given for 1/2 bedroom, 3 bedroom and 4 or 5 bedroom housing. Given the scale and mix of the existing housing stock this would appear to be reasonable.

**Policy H3 Requirements of housing: residential car parking** This policy is supported.

**Policy H4 Requirements of housing: homes designed for energy efficiency** This policy, which seeks to embody sustainable development principles, including renewable energy and Low Emission Vehicle Charging Infrastructure, as standard in new dwellings, is supported. However, it could be expanded upon, or an additional policy inserted, to include Sustainable Drainage Systems (SuDS) and permeable surfacing requirements in new development. The policy might also require that significant refurbishment or extensions to existing dwellings should require the addition of energy efficiency measures, including low emission vehicle infrastructure. Whilst there is no need to

justify the need for climate change mitigation, its inclusion would contribute to the understanding of why the policy has been included.

DCC would suggest that all new housing should include the provision of accessible cycle storage, see: <https://www.cambridge.gov.uk/media/6771/cycle-parking-guide-for-newresidential-developments.pdf> NB. This design guide includes provision for flats, and other dwellings with no individual garages or outdoor space.

***Action: All suggestions incorporated***

### **Policy H6 Housing design**

With regard to any new residential development, the design standard should aim to meet a high level of sustainable design and construction, optimised for energy efficiency, and targeting zero carbon emissions. Non-residential development should be encouraged to exceed less stringent energy efficiency requirements in building regulations for the nondomestic sector. A good aim, for example, would be to achieve a BREEAM score of 'outstanding' or 'excellent' as the scoring method contains a significant weighting towards energy efficiency.

***Action: Agreed and incorporated***

DCC recognises that improving energy efficiency in historic and traditional buildings is a greater challenge than for new developments. However, DCC would encourage Neighbourhood Development Plans to include a policy concerning the sensitive retrofitting of energy efficiency measures in this type of property while preserving a building's character and heritage. Advice is available from DCC's Conservation, Heritage and Design service and in guidance such as 'Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency' (Historic England) and from other sources.

DCC would suggest that all new developments should include designated footways within the development to facilitate safe pedestrian access to all dwellings.

***Action: Second point agreed and incorporated***

### **Transport**

DCC would suggest the addition of policies relating to the provision of public electric vehicle and electric cycle charging points. These could be located at convenient public parking spaces, on cycle routes or cycle storage areas.

***Action: This was considered by NPSG and rejected***

### **Parking Community Policy CP-T1**

DCC expresses concern about this policy, which should be viewed with caution. Any additional car-based infrastructure is likely to encourage more car-based journeys, thereby exacerbating the concerns outlined elsewhere in the document relating to traffic, speeding, and safety.

Additional car parking provision is likely to lead to additional journeys being undertaken by car, which will lead to more traffic, with concerns about speeding and safety, and additional car parking demand.

***Action: NPSG considered the concern but decided to stay with the policy***

### **Policy T1 Active travel**

Residential development should be sited and designed with active travel at the forefront of the design and delivery process.

The design of the development should include designated footways and cycle routes to ensure that active travel becomes the easiest and most direct form of travel to local destinations, including shops and schools.

This policy could be expanded to include access to cycle routes, and urban designs that give priority to active travel over motorised modes. The emphasis of the policy should be on the provision of active travel infrastructure, where vehicular access to residential areas should be designed to be secondary to walking and cycling.

***Action: Agreed and incorporated***

### **Community Policy CP-T2 School access**

The schools should be encouraged to embed sustainable travel in their policies and ethos. All schools are entitled to take part in Modeshift STARS <https://www.modeshiftstars.org/>, the National Accreditation Scheme for school sustainable travel. This should be promoted, and all relevant activities recorded in order for Hilton school(s) to work towards Bronze, Silver and Gold level accreditation. Further information and support is available via [sustainable.travel@derbyshire.gov.uk](mailto:sustainable.travel@derbyshire.gov.uk)

***Action: NPSG consulted with the schools but they did not want to go down this route***

### **Policy T3 Cycle paths**

DCC would suggest the addition of the following words to the policy ...*'between homes and local destinations, and to the local cycle network'*.

The policy is supported but could also be expanded to include a requirement for safe and secure cycle parking/storage to be provided at destinations e.g. schools, shops, community and business premises.

***Action: All suggestions agreed and incorporated***

### **Safe walking and cycling routes Community Policy CP-T3 Cycle routes**

DCC would suggest the addition of the following words to the policy ...*'particularly those routes between homes and local destinations and the local cycle network'*.

***Action: Agreed and incorporated***

### **Community Policy CP-T4 Bus services**

DCC would suggest that all opportunities to enhance bus services should be fully explored, including the use of developer contributions to provide or enhance services for the benefit of all residents.

#### ***Action: Agreed and incorporated***

For information, DCC is about to publish a Developer Contributions Protocol (due for consultation in December 2019/January 2020) which states:

Contributions from developers to the cost of bus services and related infrastructure are an important source of funding to mitigate the impact of new development in an area. This can take two forms:

- Local Bus service contributions to provide socially necessary services, including revenue support for services that are forecast to break-even and become commercial in the future. This will include contributions for school bus services where appropriate. See Appendix A to this section for more details.
- Infrastructure contributions to provide bus stop facilities including shelters raised kerbs, information (including real time information) and bus priority measures, including bus stop clearways. Further information about funding for bus infrastructure improvements is shown in Appendix B to this section.

### **Environment Flooding**

DCC would encourage the addition of policies that could include requirements concerning, for example, the introduction and use of SuDS; landscaping; new developments incorporating green roofs and walls; water efficiency such as new developments incorporating rainwater harvesting technology; promotion of tree planting and street trees; and work with landowners and statutory bodies to promote better management of upland areas to reduce the flow of floodwater to vulnerable areas.

#### ***Action: Flood mitigation policy agreed and incorporated***

### **Policy E1 Green spaces**

The policy, which is supported, seeks to protect 19 identified green spaces throughout Hilton and to encourage new green spaces. Again, the policy could be expanded to require new development to design SuDs as publicly accessible green spaces, avoiding an over-engineered appearance. A good guide, which could be referenced, is 'The SuDs Manual, CIRIA 753', available in the form of a free download from the Construction Industry Research and Information Association (CIRIA.org).

#### ***Action: SuDS incorporated into policy***

### **Policy E2 Retaining village identity**

The policy calls for the separation between villages in the Plan area to be maintained. In the absence of an area defined in the Local Plan, the policy should identify such an area as open space to be conserved for the purpose of maintaining the separation. This would need to be supported by a plan showing the area to be preserved as open.

***Action: NPSG investigated open space preservation but SDDC advised that it was not applicable in this case***

### **Policy E3 Community land**

The policy needs to be re-worded; as it stands, it is not implementable as the Plan cannot require proposals to be put forward. The policy should state that proposals which include the provision of/for an increase in land for community gardening, orchards and allotments will be supported.

***Action: Agreed and incorporated***

### **Policy E4 Nature conservation**

The policy should include a requirement for applications to be accompanied by a statement setting out how the proposal will conserve and enhance biodiversity and provide net biodiversity gain (E5). Green infrastructure should be linked to previous policies on active travel, SuDs, community land and the preservation of existing green spaces. It should also make reference to “The Landscape Character of Derbyshire” (available in PDF form from the County Council web site at: <https://www.derbyshire.gov.uk/environment/conservation/landscapecharacter/landscape-character.aspx> )

DCC would suggest that the policy could be more specific about which areas to protect. An example of a more detailed policy can be found in the Quarndon Neighbourhood Development Plan.

***Action: NPSG agreed and incorporated the first part of this suggestion***

### **Policy E5 Biodiversity**

This policy is supported.

## **Leisure, amenities and services Policy L1 Recreational facilities**

### **Policy L2 Healthcare facilities**

**Policy L3 Hilton village shopping centre development** These policies are supported.

### **Education**

DCC’s Children’s Services Department has reviewed the chapter on Education and has no comments to make on it.

## **Business Policy B1 Business units**

This policy supports new small scale business development; however, DCC would suggest that the policy should include a requirement for the inclusion of off-street parking appropriate to the demand likely to be created by the business, including the provision of low emission vehicle charging infrastructure.

***Action: Agreed and incorporated***

**Policy B2 Home working** This policy is supported.

### **Public Health**

DCC's Public Health Department has considered how the plan aligns with the agreed 'Strategic Statement – Planning and Health across Derbyshire and Derby City' (see attached) and has collated comments accordingly: where DCC feels it supports the priorities, where it could be strengthened, or where it might need to be more explicit. The HMoDHNP draft plan does not make any reference to Health Impact Assessments (HIA). DCC would suggest that the following statement should be added to the Plan:

*“Planning applications for major residential developments of 100 dwellings or more should ideally be accompanied by a Health Impact Assessment (HIA), where there is likely to be a negative impact on population health as a consequence of development.”*

**Action: NPSG considered the suggestion but as we do not envisage developments of 100 or more this is not required**

The HMoDHNP draft plan also makes no reference to Environmental Impact Assessments (EIA) and population human health as one of the EIA considerations. The Neighbourhood Plan Steering Group might want to consider adding this to the plan.

**Note: SDDC providing this**

The following policy statements make a positive contribution to the reduction of sources of air pollution and exposure:

- Policies on sustainable heating and energy are included.
- Consideration of the impact of air pollution exposure from housing is demonstrated.
- Policies include consideration of Low Emission Vehicle Infrastructure.
- There are a range of policies to support improved cycling and walking and access to public transport. These have been carefully considered with reference to key travel sites for the community.

DCC would draw the attention of the Neighbourhood Plan Steering Group to the latest guidance, in order to further enhance policy related to the reduction of air pollution (see link below to the National Planning Policy Guidance on Air Quality) <https://www.gov.uk/guidance/air-quality--3>

**Action: Reference incorporated**

DCC would suggest that the Neighbourhood Plan Steering Group should consider the inclusion of:

- a requirement in Policy H4 Requirements of housing, homes designed for energy efficiency, to “maintain adequate separation distances between sources of air pollution and receptors”, thereby ensuring that housing design avoids canyons and promotes setbacks from potential sources of air pollution such as roads. This might include the use of green space, hedgerows and other physical spacing.

- “using green infrastructure, in particular trees, where this can create a barrier or maintain separation between sources of pollution and receptors” within policies H6 Housing design, T1 Active travel, or E1 Green spaces. Green infrastructure can support the absorption of dust and other pollutants and provide physical barriers between the highway and pedestrian or cycling infrastructure.
- measures to “control dust and emissions from construction, operation and demolition” during any construction processes.

***Action: Suggestions incorporated where appropriate***

### **6.1 – Prioritising positive prevention**

The HMoDHNP draft plan makes reference to promoting safe active travel by ensuring all new developments include proposals to make walking and cycling more attractive, linking up existing pathways to make walking safer. There is also a plan to improve sporting facilities in the area.

Proposals to develop community land into allotments and orchards will increase the ability for people to grow their own food and increase activity levels.

### **6.2– Supporting positive mental wellbeing**

The HMoDHNP draft plan mentions increasing the use of cycle and walking and walking routes, and advocates behaviour change and targeted participation programmes at a community level to encourage more walking and cycling. The Plan could also be strengthened by encouraging the ‘Five Ways to Wellbeing’ (see attachment):

1. Be Active – increasing walking/cycling paths, linking new and existing pathways for safer, active travel, enhancing sporting facilities at The Mease Pavilion and turning community land into allotments.
2. Give – are there enough community venues to cover all the settlements in order to promote social connectedness?
3. Keep Learning – the Plan is proposing to engage with local educational organisations to establish Adult Education opportunities.
4. Take Notice – there are proposals to increase and improve green spaces in the area, but also to preserve the green space already available and not permit any building on these sites.
5. Connect – the Plan could add a little more as to how socially isolated people could get out, meet and talk to others locally.

***Action: Wellbeing statement incorporated***

### **6.3 – Supporting healthy ageing**

There are plans to build up to 20 sheltered bungalows which will promote independence for older people wanting to stay in their own home, and there is also a proposal to build a residential care home for up to 40 beds, both of which will provide social connectedness. However, there is a need to consider how infrastructure for dementia-friendly communities can be provided, as outlined in the Strategic Statement.

Any proposals to improve local bus services, especially for the elderly and disabled, would promote connectedness and improve mental wellbeing.

#### ***6.4 – Enabling people to connect with each other***

There are proposals to build mixed use housing developments and the recreational space at the Mease Pavilion will be enhanced to create more sports facilities. The village hall appears to be the only meeting point for the community, so it may be necessary to consider additional community venues as the village increases in size. Transport links could be improved as bus services only operate through Hilton every half hour in each direction to Derby and Burton-on-Trent and do not service the whole of the village.

***Note: There are other meeting points for the community – Scout Hut, Mease Pavilion, Methodist Chapel etc.***

The HMoDHNP draft plan also proposes to ensure that any new development must enable the enhancement of digital infrastructure in the area and incorporate full fibre connections, including ducting capable of accommodating more than one digital infrastructure provider.

***Action: Agreed and incorporated***

#### ***6.5 Healthy Homes***

The HMoDHNP draft plan refers to rapid housing development within the locality, but development has not met the current housing needs and does not serve the growing needs of the area. A recent survey shows that provision is needed for first homes and homes for the older generation; the Plan also states that future developments should be environmentally friendly and have gardens.

The Plan does not mention building to Lifetime Homes Standards or M4 (2) category of home that is accessible and adaptable. Living in poor quality homes that require improvement has a fundamental negative impact on health, particularly for the most vulnerable people in society e.g. children and older people.

***Note: The Plan does reference M4 standard homes***

The HMoDHNP draft plan does not mention Housing Standards, and neither is there any reference to the cost per dwelling to bring any current poor housing to a level of expectable standard. DCC would suggest that the Plan would be strengthened if it were to include a reference to ensuring that existing housing stock could be maintained to a good quality, or is renovated or replaced if it requires improvement to Building for Life 12 (BfL 12) standards.

***Action: Having agreed the BREEAM standard, the NPSG did not action this suggestion***

Other areas from the Planning and Health Strategic Statement that the Steering Group might want to consider including to strengthen the Plan are:



- Supporting Dementia-friendly communities, and enabling connectedness. Encouraging developers to design homes to a lifetime standard that includes facilities and features that enable people to live independently for longer.
- Including a reference to mixed use housing development that would create opportunities for connectedness between members of the community who might not otherwise come into contact with each other e.g. via a shared recreational space to encourage inter-generational contact and neighbourhood community centres.
- Making reference to existing housing stock, including plans for renovation, and replacing poor quality housing stock.

***Action: The NPSG considers the Plan already addresses enabling people to live independently for longer. The existing housing stock is mainly very young.***

### **Omissions**

There are no policies setting out the position on development proposals outside the settlement framework. As it stands, the plan would not support any development outside the built framework; however, it is likely that individual plots or extensions, including the conversion of existing farm buildings, might come forward.

***Action: The NPSG considers these points are already covered by SDDC policies.***

Policy H4 Requirements of housing: homes designated for energy efficiency, calls for energy efficient housing, but there are no policies setting out how proposals for other renewable energy proposals might be considered. Again, it is possible that there might be proposals for small-scale wind turbines, typically on-farm, or for solar installations, within the parish. The Plan does not offer any guidance as to how these would be considered.

***Action: The NPSG considered this suggestion but decided the SDDC policy already covered this.***

The National Planning Policy Framework (NPPF) (Chapter 15, paragraph 178ff – Ground conditions and pollution) stresses the importance of planning policies in managing the impact of noise and light pollution on health, living conditions, the natural environment and potential sensitivity of a site where development is proposed.

Noise and light pollution can affect people's natural body rhythms and have a detrimental impact on human health. It can also affect wildlife including bats, insects and many nocturnal mammals and birds, disrupting their normal feeding and breeding behaviours, and migratory patterns.

DCC would encourage Neighbourhood Development Plans to include policies on the control and mitigation of noise and light pollution. This is particularly relevant to new developments and public spaces but plans should also consider existing residential areas. The Campaign to Protect Rural England (CPRE) NightBlight website is a useful resource for exploring light pollution, dark skies and potential policies about this.

***Action: Agreed Noise policy formulated.***

Policies H4 Requirements of housing: homes designated for energy efficiency, and E4 Nature conservation, omit to make reference to issues associated with external lighting. Unnecessary external lighting can be energy inefficient and have adverse impacts on a number of nocturnal species including invertebrates, birds and bats (all bat species are protected). There are also documented physical and mental health issues associated with exposure to artificial lighting and its impacts on circadian cycles. H4 may therefore also include the topic of external lighting design.

***Action: Agreed and incorporated***

There are no policies relating to the conservation and enhancement of heritage assets, including non-designated heritage assets. The Plan includes just 3 lines of text on the subject. There is no schedule of listed buildings or other non-designated heritage assets.

***Action: Agreed to incorporate schedule***

The attached document includes suggested wording and supporting information on some of the issues mentioned above.

**Waste Minimisation**

Issues for consideration include landfill and incinerated waste, which are a particular problem for resource efficiency, and compound climate change. Prevention, reuse, recycling and composting are all positive approaches to minimising the harmful effects of waste.

DCC would encourage the Neighbourhood Plan Steering Group to consider policies for waste minimisation. Policies could include the provision of opportunities for public recycling – bottle banks for example, litter prevention, and the collective management of waste from commercial premises.

***Action: The NPSG considered the suggestion, but there are adequate existing facilities and locations for additional facilities could not be easily identified – no action.***

I trust that you will be able to take these comments into account and incorporate them into the Submission Version of the Plan.

Please contact me if you wish to discuss the comments further.

Yours sincerely

David M Dale  
Policy and Monitoring and LA lead: CLIP: Planning Sub-group

Copies:

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David Arnold, Head of Planning Services  
Steve Buffery, Policy and Monitoring  
Alison Richards, Policy and Monitoring  
Richard Sandbach, Policy and Monitoring  
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Richard Lovell, Sustainable Travel Team  
Michael Reardon, Sustainable Travel Team  
Jennie McCusker, Children's Services  
Tony Kearsey, Commissioning, Communities and Policy  
Denise Ludlam, Commissioning, Communities and Policy  
Jane Careless, Adult Care  
Vicky Smyth, Adult Care  
Jane Horton, Adult Care  
Karen Beavin, South Derbyshire District Council

## **Decentralised, Renewable and Low-Carbon Energy Technologies**

Renewable and low-carbon related energy development has the potential to make a significant contribution to sustainable development, while needing to be balanced against other important considerations, notably the potential impact on the Parish's high quality landscape, heritage attributes and residential amenity.

Any development must therefore be of an appropriate scale, in a suitable location, and sensitive to the special and high quality landscape of the Parish, as well as respecting residential amenity and other important heritage considerations.

### **POLICY X DECENTRALISED, RENEWABLE ENERGY AND LOW-CARBON TECHNOLOGIES**

***Suitably located and designed proposals that promote and encourage the development of renewable and low-carbon energy resources, will be permitted following consultation with local residents, the Parish Council and District Council, where either individually or cumulatively, it can be demonstrated that any adverse impacts have been addressed. Proposals will be supported that:***

- a) do not have an unacceptably adverse impact on the amenity of local residents (including: noise, vibration, visual impact, shadow flicker, water pollution, odour, air quality, emissions, sensitivity and character of the landscape);***
- b) do not have an unacceptable adverse impact on any designated site (including: Site of Special Scientific Interest, regionally or locally important geological site, site of ecological value, Special Landscape and Landscape Character Areas, Listed Building, heritage asset, Local Green Space, Conservation Area or their settings);***
- c) in the case of wind turbines, it can be demonstrated that the development would not result in an unacceptably adverse effect on protected species, including migration routes or sites of biodiversity value;***
- d) in the interests of residential amenity and safety, there is an appropriate minimum separation between wind turbines over 25m to blade tip and residential properties;***
- e) in the case of ground mounted solar panels, it can be demonstrated that they do not result in the loss of good quality agricultural land;***
- f) proposals should include details of associated developments including access roads and ancillary buildings. Transmission lines should be located below ground wherever possible in order to reduce the impact on the open countryside.***

- g) measures are included for the removal of structures and the restoration of sites, should sites become non-operational.***
- h) identify the potential positive effects the proposed renewables development would have on the local environment and community; and***
- i) do not have any negative impact on the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site or its buffer zone;***

***Small and medium scale, decentralised, domestic renewable energy systems, including building mounted solar energy and biomass, ground and air source heating systems, will be encouraged as part of proposals for new buildings and where conversion or significant refurbishment of existing buildings are being considered.***

## **Ultra-Low Emissions Vehicle Infrastructure**

There is overwhelming evidence that petrol and diesel-powered vehicles cause pollution, which contributes to climate change, poor air quality and is dangerous to public health. For these reasons the government intend to end the sale of conventional internal combustion engine powered cars by 2040. Policy makers, vehicle manufacturers and other transport innovators are therefore working to build interest in and around the use of alternative fuels, for example electricity, bio-methane and hydrogen.

As many transport users will make the transition to Ultra-Low Emissions Vehicles (ULEVs) over the next few years it is appropriate to consider the need for suitable charging infrastructure that is 'fit for purpose', represents good value for money, and responds directly to the increasing expectation and demand for a network of public access infrastructure.

The UK has seen a surge in demand for ULEVs, including electric vehicles. 2016 saw a record year of sales. There are currently just over 100,000 ULEV cars on UK roads and that figure is expected to rise to around 1 million (OLEV) by 2025. The pace of demand and ever changing technology means that by 2030 it is expected half of all new cars will be ULEVs.

## **POLICY Y ULTRA-LOW EMISSIONS VEHICLE INFRASTRUCTURE**

***The electrical infrastructure within all new developments must be capable of the future addition of Ultra-Low Emission Vehicle charging infrastructure in terms of anticipated load capacity.***

***New commercial or community facility proposals should include provision of Ultra-Low Emission Vehicle and secure e-bike charging points available for both the public and staff.***

***Residential developments must ensure that secure cycle and e-bike storage is available and accessible.***

***New development should either:***

- ***Provide off road charging infrastructure***
- ***Ensure that electrical infrastructure within all developments is capable of the future addition of charging infrastructure in terms of anticipated load capacity or***
- ***Provide publicly accessible Ultra-Low Emissions Vehicle and e-bike charging points.***

## **Dark Skies**

Darkness at night is one of the key characteristics of rural areas and there is some concern that it is being diminished by light pollution. Sources of light can include light spill from roof lights, street lighting, decorative exterior lighting and poorly installed security lighting. The National Planning Policy Framework (paragraph 180c) notes that in seeking to protect and enhance the natural environment, planning policies “should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”.

Light pollution affects the character of the countryside and obscures views of the night sky. It is of particular concern for wildlife including bats, insects and many nocturnal mammals and birds, disrupting their normal feeding and breeding behaviours and even migratory patterns. There is increasing concern that exposure to artificial lighting can disrupt the body’s natural rhythms have detrimental impacts on human health.

The Campaign to Protect Rural England (CPRE) has produced detailed maps showing the amount of light pollution across the country. NAME Parish is affected by light pollution...geographical description. The Plan therefore seeks to ensure that the existing dark skies outside of the main settlements and, particularly in ... geographical description parts of the parish are protected and that new developments do not increase light spillage, preventing further deterioration of the night skies.

## **POLICY Z DARK SKIES**

***Development where planning permission is required must limit, and where possible, reduce the impact of light pollution from artificial, externally visible light sources. Proposals to introduce new lighting into areas that do not***

***presently have artificial lighting will be resisted, unless it is demonstrated that this is required for road and/or pedestrian safety.***

***External lighting should be designed to reduce the impact on dark skies, avoiding excessive use of up-lighting or the unintentional illumination of adjacent areas.***

### **Sustainable Transport**

Proposals for new development should support the implementation of a transport hierarchy:

Reduce - the need to travel

Active travel - facilitate walking and cycling

Mobility as a Service - enable a connected and low emission, multi-modal, public transport system

Encourage the uptake and use of LEVs

Provide a safe and accessible highway network

Development proposals should ensure adequate provision of: safe and convenient walking and cycle routes including cycle storage, consider connectivity with public transport routes and existing infrastructure, require the inclusion of LEV charging infrastructure and provide a safe and accessible highway connection.

### **Climate Change and Sustainable Design Principles**

The government has committed the UK to achieving net zero greenhouse gas emissions by 2050 in response to climate change. If this target is to be achieved every new development must make its contribution to emissions reduction and should aim to be as close to carbon neutral as possible. While off setting of emissions can play its part, it is more advantageous to eliminate the emissions from the outset.

Emissions reductions can be achieved through the design and layout of a development and through the selection of construction materials and techniques employed. Building design and layout will inevitably be a compromise between compatibility with the existing local street layout and building style. The ideal situation of south facing elevations and roof pitches to enable the provision of solar PV and passive solar designs may be more challenging to accommodate within the existing street layout.

Renewables and energy efficiency targets, passive solar design, materials considerations, air quality issues and green infrastructure, secure cycle parking at home and at destinations.

**Sustainable Drainage Systems and Water Efficiency**

Impacts of climate change, increased intensity of rainfall, need for groundwater recharge, wildlife impacts, provision of POS, potential for heatwaves and drought, natural cooling afforded by green spaces.



## Strategic Statement Planning and Health across Derbyshire and Derby City

Our vision is for places across Derby and

Derbyshire that ensure every child and adult has  
the opportunity to live a healthy and fulfilling life

**1. Purpose:** To agree an ambitious vision, shared priorities and principles for delivering the Combined Authority's member organisations duty to cooperate in respect of health and planning.

### 2. Background and information

Responsibility for public health transferred to local authorities in April 2013 and this gave councils new opportunities to improve joint working between public health and planning as well as related disciplines such as housing, transport planning and regeneration, in order to improve health and reduce health inequalities locally.

To achieve this we need to identify links between public health objectives and how places can be shaped to respond to them, with reference to the *National Planning Policy Framework 2012* (NPPF) and national public health outcomes indicators. In addition, it needs to reflect the added value that joint work on planning and health can bring to local priorities identified in the Derby and Derbyshire Joint Strategic Needs Assessments and Health and Wellbeing Strategies, Director of Public Health Annual Reports, Locality Public Health Plans and the Derbyshire Healthy Communities Programme (Refs: Appendix 1).

The statement reflects the different needs of communities across Derby and Derbyshire, as well as identifying principles to underpin joint working at local and strategic level and specific health priorities for joint working on planning and health.

### 3. Our communities

Appendix 2 provides a summary of key information about the population of Derby and Derbyshire. Poor health is both a limiting factor to increasing economic activity rates, as well as a consequence of low economic activity rates. The causative links between socio economic inequality and chronic

stress and poor health are well understood and improving health and tackling these inequalities is a key component of achieving sustainable communities.

#### **4. What does the planning system do already in relation to health?**

The planning system acts to mediate the demands of the market and the social and environmental impact of development. As a part of this, planners work with applicants throughout the development process in a bid to secure wider social benefits, such as benefits for health infrastructure or public health. Although the planning system is positively geared towards achieving social benefit, the ability of planners to intervene in the existing built and natural environment is limited unless new development proposals come forward and planners must negotiate specific planning obligations in the context of development viability and defined criteria. This means the planning system can require reasonable, appropriate and necessary contributions from developers and social benefits need to be considered as a whole.

The *NPPF* guides local planning authorities to integrate the health agenda, through the 'Promoting Healthy Communities' chapter, into planning policy and development management decisions. Also, *National Planning Practice Guidance* (NPPG) provides advice for local planning authorities and specifically the role planning has to play in supporting health through the 'Health and Wellbeing' chapter.

There are two main tools that the planning system can use to help achieve health objectives. Firstly, through the local and neighbourhood plan process, and the development of planning policy. Although health is not usually a separate policy area in land-use planning it is regularly integrated throughout policy frameworks; for example, aiming to provide accessible service centres for local communities has health and wider benefits. Secondly, the development management process enables planners to negotiate any planning contributions and look to steer the design of a development to address health objectives.

#### **5. What principles should underpin the planning and health agenda?**

Local planning authorities can use the following principles to enable them to achieve a healthy built and natural environment across Derbyshire and Derby City:

- Embed sustainability and protection of the environment across the planning system to assure the future of a healthy built and natural environment.

- Help provide accessible service centres, shared spaces and community facilities which serve day-to-day needs
- Encourage walking and cycling through the provision of pedestrian/cyclist friendly infrastructure, measures to prevent road traffic accidents and concentrating development as close as possible to service centres and employment
- Create healthy living environments through the provision of community open space, recreation and sport facilities
- Help protect and enhance public rights of way
- Protect people's health from air pollution, noise, flood risk and accidents
- Ensure the delivery of high quality homes and good design standards that meet the varied needs of local communities and an ageing population
- Active consultation between local planning authorities, healthcare commissioners and public health teams to help understand, and plan for, impact of development on health services and the health of communities
- Consult with communities to help understand local perspectives on health and any concerns that can be addressed through the planning system
- Look to pro-actively address areas of health inequality wherever possible
- Where appropriate seek contributions towards new health related infrastructure to support development through planning obligations
- Maximise the opportunities for recreation and connecting people with the outdoors, the natural world and cultural heritage through Derbyshire unique assets, such as the National Parks.

## **6. Health priorities for the planning system**

This section presents the priorities for planning and health which reflect where the planning system can make the greatest contribution to delivery of priorities identified in the Health and Wellbeing Strategies for Derby and Derbyshire and other strategic local plans listed in section 2 above.

### ***6.i: Prioritising positive prevention***

The first priority is to promote the development of healthy environments that actively support people to maintain a healthy weight. We aim to change the embedded culture of routine car use to one which promotes safe active travel and use of public transport, ensuring a focus on connectedness between where people live and where they work, study, spend their leisure time and access services. In addition, we will explore how we could use local greenspace to

support sustainable access to healthy foods, in order to help tackle food poverty in Derbyshire. We will use evidence and intelligence<sup>1</sup> to understand how behavioural nudges can be 'built in' to support these healthier behaviours, and to demonstrate the impact on the economy of having a healthier workforce.

### ***6.ii: Supporting positive mental wellbeing***

The environment in which we live directly impacts on our mental well-being - access to good quality homes, safe streets and greenspace helps support happier and healthier individuals and local communities. Using place-shaping to improve the mental wellbeing of local people has the potential to make a significant positive impact on the local economy through reducing sickness absence and maintaining a motivated and productive workforce.

Neighbourhood planning can actively engage local people in ensuring community interests and concern (such as exposure to noise or air pollution) inform decisions, and the planning system as a whole can help support the delivery of the 'Five Ways to Wellbeing' summarised below:

- a) ***Be Active*** – delivery of priority 6.i clearly links to this objective
- b) ***Give*** – Active participation in social and community life can be supported through interventions that promote social connectedness (priority 6.iv below)
- c) ***Keep Learning*** – Ensuring access to places in local communities where people can continue to learn throughout their life supports mental wellbeing.
- d) ***Take Notice*** – Access to greenspace and local environments that help individuals connect with the natural world is proven to enhance wellbeing.
- e) ***Connect*** – small changes to places can be planned to enable people to connect with one another more – for example simply placing benches in residential areas provides opportunities for socially isolated older people with limited mobility to get out, meet and talk to others locally.

### ***6.iii Supporting healthy ageing***

The number of people aged 65 years and over across Derby and Derbyshire is projected to increase significantly over the next 25 years. We want to maximise the very real benefits these demographic changes will bring about. Older people make a significant contribution to society and the economy in a number of ways, including through their spending power, provision of social

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<sup>1</sup> 'Evidence' in this context is the term used to describe information that has been demonstrated through empirical research, while the term 'intelligence' incorporates information derived from a broad range of sources including evidence, service data, public perspectives / views and qualitative and quantitative information.

care, volunteering and support for charities and their own families. If people can stay healthy for longer, they can continue to make a significant contribution to our communities, and reduce the increased demand on health and social care. Specific ways in which the planning system as a whole can contribute to healthy ageing is to ensure new homes are built that promote independence and respond to changing needs as people age, design new neighbourhoods which provide the infrastructure for dementia friendly communities and enable social connectedness (see priority 4.iv below).

#### ***6.iv Enabling people to connect with each other***

Social cohesion is a feature of strong and vibrant communities, and is characterised by a sense of belonging, shared interest in addressing challenges and inequalities, where diversity is appreciated and people feel safe and valued. Some areas of Derbyshire are very rural and issues such as transport, opportunities for social interaction and access to services, including high speed internet access, remain a real challenge. The planning system can continue to support connectedness within communities by creating places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other including, for example, through housing developments that are mixed use, design of residential streets to encourage their use for social interaction, shared recreational space to encourage intergenerational contact, provision of neighbourhood centres and well-designed street frontages.

#### ***6.v Healthy homes***

The type and condition of peoples' homes has a direct impact on the health and well-being of individuals, families and communities across Derby and Derbyshire, and contributes to inequalities in health outcomes between different areas and groups within the population. Living in a poor quality home, characterised by damp, mould and excess cold or exposure to air pollution or noise, can lead to an increased risk of cardiovascular and respiratory disease as well as to mental health problems. In addition, structural defects can increase the risk of accidents, and overcrowding contributes to increased risk of communicable disease. We need to collate intelligence on current and future housing needs of all sections of the population, especially those most at risk of insecure tenancy and poor housing.

The contribution of strategic planning to healthy housing can be maximised by planning the building of the right homes in the right places for all sections of the

population, renovating or replacing existing homes that require improvement and implementing the principles and learning from the Healthy New Towns programme. This work will be supported and informed by a review of housing and health commissioned by the Derbyshire Housing Strategy Group and Derbyshire Joint Strategic Needs Assessment Board and due to report in early Spring 2016.

## **7. Monitoring**

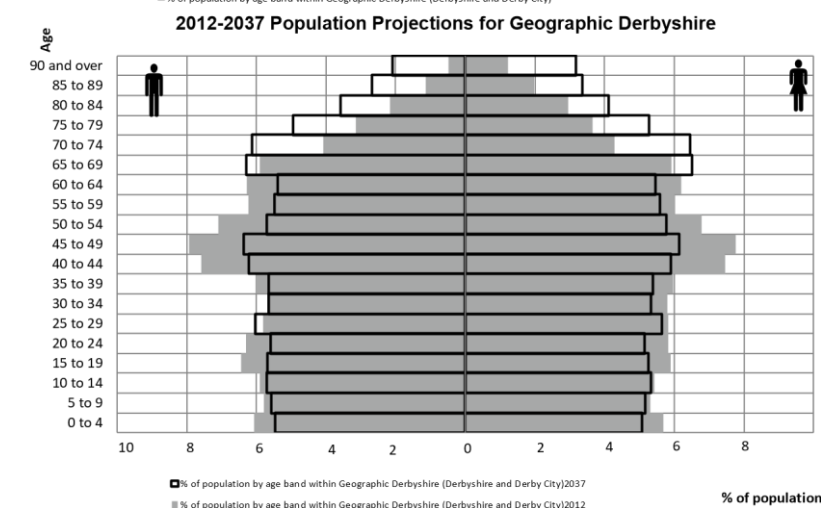
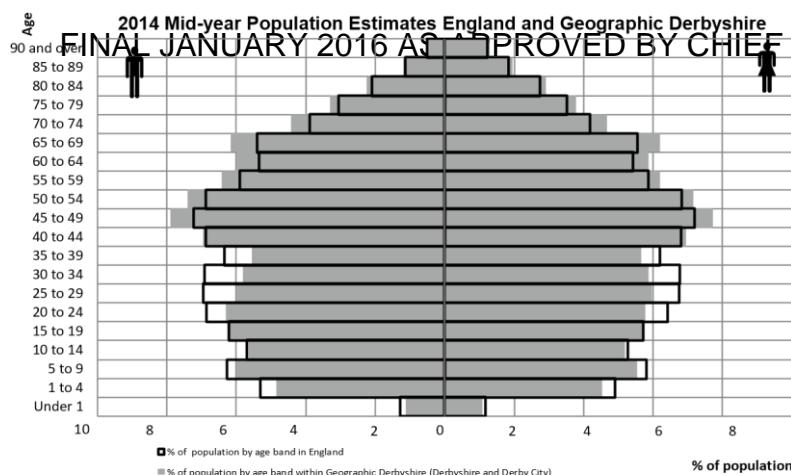
The Derbyshire Planning and Health Steering Group will monitor overall progress against these priorities using two key outcomes:

- Increased healthy life expectancy in Derby and Derbyshire
- Reduced gap in healthy life expectancy between communities across Derby and Derbyshire

## Appendix 1: References

|  |   |
|--|---|
| National Planning Policy Framework (NPPF)  | <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf</a>   |
| National Planning Practice Guidance (NPPG)   | <a href="http://planningguidance.planningportal.gov.uk/">http://planningguidance.planningportal.gov.uk/</a>   |
| Localism Act 2011, Chapter 20, Part 6, Chapter 1, Section 110  | <a href="http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted">http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted</a>   |
| National public health outcomes indicators   | <a href="https://www.gov.uk/government/publications/healthy-lives-healthy-people-improving-outcomesand-supporting-transparency">https://www.gov.uk/government/publications/healthy-lives-healthy-people-improving-outcomesand-supporting-transparency</a>               |
| Derby and Derbyshire Joint Strategic Needs Assessments (JSNA)  | Derbyshire<br><a href="http://observatory.derbyshire.gov.uk/IAS/Custom/Resources/HealthandWellbeing/SoD_2014_DO.pdf">http://observatory.derbyshire.gov.uk/IAS/Custom/Resources/HealthandWellbeing/SoD_2014_DO.pdf</a>   |
| Derby and Derbyshire Health and Wellbeing Strategies   |   |
| Director of Public Health Annual Reports   | Derbyshire available at<br><a href="https://www.derbyshire.gov.uk/social_health/public-health/about_public_health/default.asp">https://www.derbyshire.gov.uk/social_health/public-health/about_public_health/default.asp</a>  |
| Derbyshire Healthy Communities Programme   |  <br>The Healthy Communities model.do Partner Update Sept   |
| Five Ways to Wellbeing   | <a href="http://b.3cdn.net/nefoundation/8984c5089d5c2285ee_t4m6bhqq5.pdf">http://b.3cdn.net/nefoundation/8984c5089d5c2285ee_t4m6bhqq5.pdf</a>   |
| Healthy New Towns Programme  | <a href="http://www.derbyshire.gov.uk/images/Agenda%20item%20%20-%20Healthy%20New%20Towns%20Programme_tcm44-270225.pdf">http://www.derbyshire.gov.uk/images/Agenda%20item%20%20-%20Healthy%20New%20Towns%20Programme_tcm44-270225.pdf</a>                               |
| Town and Country Planning Association (TCPA)<br>Planning healthier places – report from the reuniting health with planning project | <a href="http://www.tcpa.org.uk/data/files/Health_and_planning/Health_Phase_2/Planning_Healthier_Places.pdf">http://www.tcpa.org.uk/data/files/Health_and_planning/Health_Phase_2/Planning_Healthier_Places.pdf</a>   |
| TCPA<br>Reuniting health with planning – creating health promoting environments  | <a href="http://www.tcpa.org.uk/data/files/Health_and_planning/Health_Phase_2/Planning_Healthier_Places.pdf">http://www.tcpa.org.uk/data/files/Health_and_planning/Health_Phase_2/Planning_Healthier_Places.pdf</a>   |
| TCPA<br>Reuniting health with planning – healthier homes, healthier communities  | <a href="http://www.tcpa.org.uk/data/files/TCPA_FINAL_Reuniting-health-planning.pdf">http://www.tcpa.org.uk/data/files/TCPA_FINAL_Reuniting-health-planning.pdf</a>   |
| Royal Town Planning Institute (RTPI)<br>Inclusive planning and health  | <a href="http://www.rtpi.org.uk/knowledge/policy/topics/inclusive-planning-and-health/">http://www.rtpi.org.uk/knowledge/policy/topics/inclusive-planning-and-health/</a>   |
| Royal Institute of British Architects (RIBA)<br>City health check – How design can save lives and money December 2013              | <a href="https://www.architecture.com/Files/RIBAHoldings/PolicyAndInternationalRelations/Policy/PublicAffairs/RIBACityHealthCheck.pdf">https://www.architecture.com/Files/RIBAHoldings/PolicyAndInternationalRelations/Policy/PublicAffairs/RIBACityHealthCheck.pdf</a> |





## Appendix 2: Key data about our communities

**Population:** 1,032,300 people are resident within Derby and Derbyshire.

The administrative County of Derbyshire has a population of 779,800 and Derby City has a population of 252,700. Between 2013 and 2014 Derbyshire's population has increased by 41,300 people or 0.5% and Derby City's by 1,100 people or 0.4%. Within the County, South Derbyshire has the largest year-on-year population growth of 1.3%, which is a greater rate of growth than seen for England (0.83%). Since 2001, Derbyshire's population has grown by 5.9% and Derby City's by 9.4%, compared to 9.3% for England. Again, South Derbyshire's population has grown much faster in

the same period at 18.4%. Conversely, other areas such as High Peak have seen much slower population growth of just 2.2%. The latest SubNational Population Projections from the Office for National Statistics (ONS) suggest that the population of the whole county will increase by 127,900 people between 2012 and 2037. Derby City's population is projected to grow at a faster rate than the administrative county. The largest percentage change in population is projected to be in South Derbyshire (22.4%). Across the age bands, relatively low growth is projected for the child population (0-15 years), whereas the percentage of the population of working-age will decrease in Derbyshire, but grow in Derby City. The largest increase in

population will be amongst those age bands 65+ and particularly the older age bands, aged 75+.

2012-2037 Population Projections for Geographic Derbyshire

| Area                  | ONS Mid Year Population Estimates (2014) |       |       |       |                                | ONS Sub- national population projections (2012-2037) |           |                    |                      |        |       |        |
|-----------------------|--|-------|-------|-------|--------------------------------|--|-----------|--------------------|----------------------|--------|-------|--------|
|                       | Total population                         | 0-15  | 16-64 | 65+   | % of total Geo Derbyshire popn | Total population                                     |           | % change 2012-2037 | % change by age band |        |       |        |
|                       |  |       |       |       |                                | 2012   | 2037      |                    | 0-15                 | 16-64  | 65+   | 90+    |
| Amber Valley          | 123,900                                  | 17.0% | 62.1% | 20.9% | 12.0%                          | 122,700  | 136,800   | 11.5%              | 3.2%                 | -5.0%  | 71.3% | 267.5% |
| Bolsover              | 77,200                                   | 17.9% | 62.8% | 19.4% | 7.5%                           | 76,400   | 83,700    | 9.6%               | 1.4%                 | -3.7%  | 61.5% | 233.8% |
| Chesterfield          | 104,300                                  | 17.1% | 62.9% | 20.0% | 10.1%                          | 103,800  | 110,600   | 6.6%               | 2.7%                 | -7.4%  | 55.6% | 226.6% |
| Derbyshire Dales      | 71,300                                   | 15.7% | 59.3% | 24.9% | 6.9%                           | 71,300   | 78,100    | 9.5%               | 1.0%                 | -11.5% | 68.9% | 196.0% |
| Erewash               | 114,000                                  | 17.8% | 62.8% | 19.4% | 11.0%                          | 112,800  | 127,500   | 13.0%              | 7.9%                 | -1.1%  | 65.8% | 274.5% |
| High Peak             | 91,400                                   | 17.5% | 63.2% | 19.4% | 8.9%                           | 91,100   | 99,500    | 9.2%               | 1.1%                 | -7.6%  | 76.9% | 254.3% |
| North East Derbyshire | 99,400                                   | 16.1% | 60.5% | 23.4% | 9.6%                           | 99,300   | 107,100   | 7.9%               | 5.9%                 | -8.3%  | 54.3% | 242.4% |
| South Derbyshire      | 98,400                                   | 19.2% | 63.5% | 17.2% | 9.5%                           | 96,000   | 117,500   | 22.4%              | 10.6%                | 6.6%   | 99.1% | 251.0% |
| Derby City            | 252,500                                  | 20.7% | 63.3% | 16.0% | 24.5%                          | 250,600  | 291,300   | 16.2%              | 9.7%                 | 8.5%   | 57.0% | 323.9% |
| Geographic Derbyshire | 1,032,300                                | 18.1% | 62.5% | 19.3% | n/a                            | 1,024,100  | 1,152,000 | 12.5%              | 6.0%                 | -1.2%  | 66.0% | 244.3% |



|                          |                                    |       |       |       |       |         |         |       |      |       |       |        |
|--------------------------|------------------------------------|-------|-------|-------|-------|---------|---------|-------|------|-------|-------|--------|
| Derbyshire               | 779,800                            | 17.3% | 62.2% | 20.4% | 75.5% | 773,500 | 860,700 | 11.3% | 4.6% | -4.5% | 68.3% | 238.3% |
| Erewash CCG              | Figures not yet published for 2014 |       |       |       |       | 94,600  | 106,500 | 12.6% | 7.7% | -1.0% | 65.7% | 253.6% |
| Hardwick CCG             |                                    |       |       |       |       | 108,900 | 118,400 | 8.7%  | 3.0% | -5.4% | 58.6% | 236.7% |
| North Derbyshire CCG     |                                    |       |       |       |       | 272,100 | 295,000 | 8.4%  | 2.7% | -8.2% | 62.6% | 246.7% |
| Southern Derbyshire CCG  |                                    |       |       |       |       | 515,300 | 596,600 | 15.8% | 8.0% | 3.6%  | 69.5% | 243.3% |
| Tameside and Glossop CCG |                                    |       |       |       |       | 253,400 | 284,500 | 12.3% | 7.0% | -0.5% | 69.0% | 232.2% |

For more information take a look at the **People and Place** section of the [Derbyshire Observatory](#)

NB: ONS population projections may not reflect the detailed housing needs assessments carried out by individual local authorities in their Strategic Housing Market Assessments.

**Housing:** There are 434,500 homes across Derby and Derbyshire

According to the 2011 Census, the geographic County of Derbyshire has:

30% detached properties      39% semi-detached properties      21% terraced properties      10% flats

The latest data from ONS indicates that the number of homes is expected to increase to 517,800 in the geographic county by 2037. Derby City (22.6%) and South Derbyshire (29.6%) are projected to have the highest growth. There are high levels of home ownership within the county and therefore ensuring private dwellings are built with appropriate design specifications to enable individuals to remain in their own home as they grow older is important. In 2013, statistics from the DCLG indicate 84.9% of properties in Derbyshire are in the private sector and in Derby City this is 80.3%, compared to an average of 82.9% for England. Derby City has a higher percentage of local authority owned houses (12.6%) and housing association owned properties (7.0%) than for the administrative county of Derbyshire where figures are 8.6% and 6.5% respectively. The ratio of median house price to median earnings is 3.7 for Derby City and 5.4 for Derbyshire. In some parts of the county, such as Derbyshire Dales this ratio is much higher at 8.3, compared to the average for England of 6.7. Across the geographic county

493 affordable dwellings were provided in 2013/14. Census data indicated there are 12.0% of houses in Derbyshire and 16.8% of houses in Derby City in the private rented sector. In addition to this national data, there are additional projections and figures utilised by the local planning authorities, which may provide more up to date information and are detailed in Local Plans and other strategic documents.

For more information take a look at the [Housing](#) section of the [Derbyshire Observatory](#)

**Health:**  
Derbyshire as

79.2% of residents are in good health across Derby and a whole.

- Excess Weight in Adults
- Hospital admissions for alcohol related episodes
- NHS Health Check Uptake
- Injuries due to falls in people aged 65+
- School readiness
- Utilisation of green space for exercise/health reasons

| Healthy Life Expectancy | Years | Years |
|-------------------------|-------|-------|
| Derbyshire              | 62.3  | 62.8  |
| Derby City              | 58.8  | 61.3  |

**Life Expectancy at birth**

|            |      |      |
|------------|------|------|
| Derbyshire | 79.4 | 83.2 |
| Derby City | 78.6 | 82.6 |

**Issues which flag red for both city and county on the Public Health Outcomes Framework:**

For many health indicators there are clear contrasts between Derby City and Derbyshire, and within the districts of the administrative county of Derbyshire other differences exist. For example, Healthy Life Expectancy varies between the two areas as shown in the infographic to the left and furthermore at a ward level these differences are more pronounced. For example in Derbyshire there is a difference of 16.7 years between the longest and shortest life expectancy at ward level. In Derby City this is 10.9 years.

According to the Index of Multiple Deprivation 2010, Derby City experiences higher levels of deprivation compared to the administrative county of Derbyshire and England as a whole. This is further reflected in the fact that Derby City has higher levels of both child and fuel poverty than the administrative county of Derbyshire, suggesting housing quality is an issue. However, in some rural communities in Derbyshire Dales where there are older stone built properties there are some of the highest fuel poverty levels in the country.

Derbyshire has an ageing population and this brings with it particular health issues, such as older people who feel socially isolated, are diagnosed with dementia and have multiple long-term health conditions.

More broadly, lifestyle factors have an impact on health and obesity is an issue for both Derbyshire and Derby City, as is smoking. Unemployment, which is an important wider determinant of health, varies across the county and the latest statistics are available in a monthly bulletin. Surprisingly, the utilisation of outdoor space for exercise or health is limited. Just 11.1% of people in Derby City and 13.3% of people in the administrative county of Derbyshire use outdoor space, compared to 17.1% for England as a whole.

For more information take a look at  
the **Health  
& Wellbeing**  
section of  
the **9**  
Derbyshire  
Observatory

## **Analysis of Residents Comments on Regulation 14 Consultation**

Many of the comments were just expressing support or reinforcing the need for one of the existing policies. There were a number which could be considered to contain an 'actionable' suggestion. i.e. they could be the basis of a policy or be part of an existing policy. Many of these were one off comments and are listed below.

The largest group of comments were around having a stricter housing policy: 5% wanted no more houses and a further 4% wanted no more houses until the 'facilities' had been fixed (in particular the Health Centre).

2% wanted a railway station

2% took the opportunity to object to the current planning application for Lucas Lane

2% wanted more traffic calming/speed cameras around the village

1% wanted a 'cycle loop' around the village

1% wanted measures taken against the Travellers to stop intimidation when accessing Hilton Gravel Pits from Sutton Lane

Single suggestions were as follows:

- 1) Swimming baths
- 2) Post box as mandatory in new housing developments
- 3) Air Quality to be addressed (also suggested by DCC)
- 4) Lights and pavement in Witham Close
- 5) Parking spaces off Welland Road (i.e. take a bit of the green space)
- 6) Secure bike parking at Village Hall and shops
- 7) Noise 'policy' (also suggested by DCC)

Finally, it is worth noting that 10 of the 18 residents who disagreed with the NP, did so on the basis that the housing policy was not strong enough i.e. they wanted no more houses. However without an NDP we would be unable to control development in the Designated Area.

## Analysis of Organisations Responses to Regulation 14 Consultation

**Sports England** made no direct comment on the content but merely referred to various paragraphs in the NPPF. **No action required**

**National Grid** commented:

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.

**No action required**

**The Environment Agency** welcomed the environmental policies and had no comments on the housing policies as the sites are not within flood zones 2 and 3. **No action required**

**Highways England** supported the business policies and stated that they would need to be consulted on the Lucas Lane proposed development and any proposals affecting the slip roads of the A50.

**No action required**

**Gladman Developments Limited** commented that:

Policy H1 needs to be more flexible to allow developments adjoining the settlement boundary.

*It is the view of NPSG that the existing policy SDT1 and H1 in the Local Plan already addresses this and hence there is no need to repeat the policy in the NP.* **No action required**

The reference to M4 standard in policy H1A should be deleted as the setting of optional Building Regulations is the role of the local authority. The setting of M4(2) and M4(3) standard has been removed from other neighbourhood plans

*It is the view of the NPSG that the NP should reflect the Derbyshire County Council policy for South Derbyshire to build more M4 standard dwellings. DCC had no objection to the inclusion of M4 standard dwellings. SDDC thought the percentage too high and would require viability testing but did not suggest deleting the requirement.* **On this basis the NPSG will leave the policy unaltered.**

Policy H5 (size of gardens) should be deleted as this is not referenced in SDDC Design SPD.

*It is the understanding of the NPSG that a NP can set policy that is more stringent than the Local Authority's. Neither DCC nor SDDC had any objection to this policy.* **On this basis the NPSG will leave the policy unaltered.**

The NP fails to demonstrate how the LGS in Policy E1 meet the requirements of national policy and guidance.

*Gladman Developments do not understand that these green spaces have already been tested and accepted against the national requirements.* **The NPSG could make this clearer in the NP.**

The policy E1 should be amended to state that development on LGS will not be supported.

*This comment follows from the misunderstanding, but SDDC have pointed out that certain development is permitted on LGS under BNE8. DCC support the policy as written.* **The NPSG could clarify the BNE8 position.**

Policy E5 should accord with paragraph 109 of the NPPF

*The paragraph referred to is in the original version of the NPPF. Paragraph 109 refers to Highway safety in the 2019 revised NPPF. SDDC raised issues of clarity with policy E5 but DCC fully supported the policy. **It is the view of the NPSG that policy E5 should be clarified as suggested by SDDC.***

**Howard Sharp & Partners** on behalf of **Providence Land** commented:

The NP conflicts with Paragraph 13 of the NPPF in that it does not shape and direct development outside of existing policies but only seeks to prevent it.

*It is the view of the NPSG that the NP is compliant with the NPPF. Whilst the vast majority of the residents in the DA wanted to prevent further housing development, the NPSG recognised that such a position was contrary to the NPPF and proposed developments that supported the needs of the residents as identified through the survey. Neither DCC nor SDDC raised this as an issue. **On this basis the NPSG will leave the housing policies unaltered.***

The moratorium on house building beyond 2028 is not supported by evidence.

*It is supported by the population projection forecasts made by the NPSG and is available as a paper on the website. **On this basis the NPSG will leave the policy unaltered.***

Policy H1B is not supported by evidence, the statement on noise is not supported by the Entran survey, it is in conflict with Paragraph 122 of NPPF as not an efficient use of land and is not deliverable.

*It is noted that SDDC also raised Paragraph 122 and DCC questioned if the policy was deliverable. The evidence for the policy emanates from the residents' survey and neither DCC nor SDDC questioned that aspect. It is true that Entran said the site could be made noise compliant. However, DCC have suggested that the NP includes a noise policy. The NPSG contends that the policy is compliant with Paragraph 122 on the basis that Lucas Lane is an attractive amenity that is important to the community; the policy maintains the prevailing character of the area; the proposed housing development does not promote sustainable travel modes and the identified need for different types of housing is satisfied elsewhere in the NP. The NPSG believe the deliverability of the policy will have to be secured by an alternative approach to that of a Land Developer. **The NPSG will develop a noise policy and a plan for the deliverability of policy H1B***

**Tenport** (actually, this response was down as a residents response and not a separate response from an organisation) commented:

The land north of the current Derby Road North Bellway site should be allocated for housing.

*Apart from not requiring any more houses in the timescale of the NP, this area of land is not suitable for housing due to its proximity to the A50 and hence the noise and potential air quality concerns.*

*It is also outside the settlement boundary. There is currently no suitable access to this land other than from Sutton Lane which is already overburdened with traffic or through the Bellway estate, but the access junction onto Derby Road is not suitable for more houses than the Bellway estate. It may be possible in the future to gain access to this land from the roundabout by Talbot Nurseries but there has been no study to explore the sustainability of such a proposal.*

**The NPSG do not intend to allocate this land for housing.**