

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.