

Belper Neighbourhood Development Plan Referendum 2021

Summary of Representations

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The following table provides a summary of the representations received in response consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 which were forward to the Independent Examiner.

Name / Organisation	Summary of Representation
Amber Valley Borough Council	<p>Repetition of national policy and/or other policies in the Plan and request information such as transport assessments that are part of the national validation requirements. Some policies not sufficiently clear.</p> <p>Minor errors and omissions identified.</p> <p>NPP 11 Non-designated heritage assets can only be established by the Borough Council,</p> <p>NPP 13 The requirement of a lift is not considered appropriate to include in the Neighbourhood Plan.</p> <p>NPP 15 The way the policy is written is unclear.</p> <p>NPP 17 Policy is ambiguous.</p> <p>NPP 21 In part not sufficiently clear</p> <p>NPP 24 In part not sufficiently clear</p> <p>NPP 28 Wording of part 1 of the policy pre-empts the planning application process</p> <p>Built framework boundary is not sufficiently clear</p> <p>Sequential test has not been applied to sites allocated in the adopted Local Plan and sequential testing is required for new development.</p>
Coal Authority	No specific comments
Derbyshire County Council	<p>Minor errors and omissions identified</p> <p>Support for the policy approach to the definition of a Built Framework, Green Belt, housing provision and mix and site allocations is reaffirmed, as too is recognition that the Plan has been informed by a wide range of County Council, Amber Valley Borough Council and specifically commissioned evidence, which has contributed considerably to the Plan providing for a robust and well informed approach to many of the issues relating to housing and employment provision and land allocations and Green Belt.</p> <p>NPP2 policy requires rewording to ensure it is not at odds</p> <p>NPP16 suggest amendments to point 3: - New development should be built around the idea of a walkable town, with innovative design to make journeys to local destinations quicker and more direct by walking and cycling rather than taking the car, with integrated adequate pathways and cycleways directly connecting to the centre of the Town and other local destinations.</p> <p>NPP17 suggest the addition to point 3: - New residential development should either provide electric vehicle charge points (1 per dwelling) as an option for new purchasers or provide suitable infrastructure for later installation by others.</p> <p>Suggest that further consideration should be given to how local assets and resources relate to and promote the 5 ways to wellbeing (be active, give, keep learning, take notice and connect).</p> <p>Suggest that consideration should also be given as to how infrastructure could be provided for dementia-friendly communities</p>

	<p>Suggest making reference to the existing housing stock, including plans for renovation and replacing poor quality housing stock</p> <p>Request that the final version of the Management Plan for the Derwent Valley Mills World Heritage Site is acknowledged</p>
Gladman	<p>The Plan must be consistent with national planning policy and the need to take account of up-to-date evidence.</p> <p>As drafted the neighbourhood plan does not propose to meet the identified housing needs of the neighbourhood area following a prioritised brownfield approach. There are greenfield sites available that can be allocated to deliver much need market and affordable housing such as Land off Sandbed Lane, Belper.</p> <p>Further work will be required in assessing reasonable alternatives through the SEA. It is not sufficient to rely on the Council's withdrawn SA that is no longer publicly available.</p> <p>Further work is also required to consider the sustainability of the strategy against the increased housing shortfall and how an alternative strategy that delivered further housing needs may be more appropriate.</p> <p>Policy approach to the protection of the World Heritage Site and its Buffer Zone does not accord with national policies and guidance.</p>
Highways England	<p>No material change regarding potential impacts on the SRN and previous comments remain unchanged. Considering the close proximity of Belper to the A38, land being promoted for development should be supported by a Transport Assessment through the development management process.</p>
National Grid	<p>No record of National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines in the Neighbourhood Plan area.</p>
Natural England	<p>No specific comments</p>
Network Rail	<p>Welcome the addition of points (4) and (5) under policy NPP17 which give support to schemes which seek to improve facilities at Belper Train Station, including enhancements to cycle storage, waiting areas and customer information systems, along with EV charging points</p> <p>Placing of the text within the section dedicated to electric vehicle charging and low emission vehicles, there is a risk that this may be overlooked Perhaps the placing of this text or the title of the section could be reviewed to clearly include public transport improvements</p>
Planning and Design Group	<p>Not considered to be in general conformity with local, including emerging, planning policy framework. It is also considered that full regard is not given to national planning policy and guidance.</p> <p>The Plan does not utilise up to date evidence of housing need and undermines the basis for the plan as a whole.</p> <p>It is considered premature to tightly define built settlement framework boundaries when it is expressly recognised that these will probably need to be amended. Amending the boundary in the light of the Local Plan is likely to be confusing.</p>

	<p>Majority of sites identified for housing development within the Submission Draft Neighbourhood Plan are not deliverable. From the identified, deliverable housing sites, there is almost no requirement for the delivery of any affordable housing</p> <p>The document has no direction of strategic planning policies. Therefore, the basic condition of displaying general conformity with relevant strategic polices has been failed lack of regard to the NPPF and does not provide a positive framework for sustainable development.</p> <p>NPP3 and NPP9 - policies will be too rigid and will not allow for a sufficient degree of flexibility or innovation. NPP 10, seeks to limit design to a very narrow set of boundary treatments and materials, which could have the potential to restrict creativity and innovation.</p> <p>NPP13a seeks to restrict housing mix to that defined by a very locally specific housing needs assessment, based on a relatively restricted evidence base. The NPPF is clear that the needs of all must be addressed.</p> <p>In respect of Policy NPP11, we object to the inclusion of Whitehouse Farm, Amber Hills, 153 Belper Lane on the list of non-designated heritage assets on the basis of the professional historic assessment submitted in connection with the application for the demolition of the property.</p>
Severn Trent Water	No specific comments to make.

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