

Keith Thomas
Secretary
Quarndon NP Steering Group

By email

Our Ref : DS
Your Ref :
Date : 10 August 2018
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Dear Keith

QUARNDON NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION

Thank you for consulting the Borough Council on the draft Quarndon Neighbourhood Plan.

It is the Borough Council's role to provide advice or assistance in relation to neighbourhood plans and it is hoped that the following comments will be of use.

General Comments

The various references in the draft Neighbourhood Plan to the Amber Valley Borough Local Plan should be to the 'submitted Local Plan'.

The Neighbourhood Plan should also ensure that any references to specific paragraphs in the National Planning Policy Framework (NPPF) are to the recently published new version (24 July 2018).

Specific Comments

6.2 Housing

Paragraphs 6.2.4 to 6.2.7

These paragraphs should be amended to distinguish between development either side of Somme Road, which is the area covered by policy H7 in the adopted Amber Valley Borough Local Plan 2006 and development south of Memorial Road (Poppyfields Meadow), which is outside the area covered by policy H7 and as such was and is not subject to the restrictions of that policy. The reference in paragraph 6.2.7 to development north of Memorial Road may also need to be amended depending on the legal position in relation to the appeal decision.

8.2.2 Housing Need and Provision for Development

Policy QSS1

This policy as worded is inconsistent with paragraph 145 e) of the new NPPF, which allows for limited infill development in villages wholly within or 'washed over' by the Green Belt and with the relevant policies in the adopted Amber Valley Borough Local Plan 2006 (policies EN2 and H4) and the submitted Local Plan (policies SS9 and H2).

You may wish to consider whether there is any evidence to support a more specific interpretation of 'limited infill development' in this policy for Quarndon as opposed to other villages 'washed over' by the Green Belt.

The policy should also distinguish between Somme Road and Poppyfield Meadows for the reasons set out in the comments in respect of paragraphs 6.2.4 to 6.2.7 above.

Appropriate amendments should also be made to the wording in paragraphs 8.2.2.1 to 8.2.2.9.

Policy QSS2

For clarity, the wording of this policy could be amended by either combining the first and third bullet points, or by revising the wording in either or both bullet points to draw a greater distinction between the two.

8.2.4 Reuse of Redundant Buildings in Open Countryside/Green Belt

Policy QSS3

This policy as worded is more restrictive than the new NPPF and you may wish to consider whether there is any evidence to support such an approach for Quarndon.

8.2.5 Separation of Quarndon from Derby and Duffield

Policy QSS4 and paragraphs 8.2.5.1 to 8.2.5.2

It should be noted that the Borough Council has commissioned a Green Belt Review, which will relate to the whole of the Green Belt within Amber Valley. Pending the outcome of this Review, the Borough Council cannot confirm whether the existing Green Belt boundary within the parish Quarndon will be retained, or whether amendments will be proposed.

8.3.2 Housing Development within the village of Quarndon

Policy QH1

You may wish to consider either extending this policy to cover that part of the village of Quarndon that is 'washed over' by the Green Belt, or introducing a separate policy for that part of the village, having regard to the comments in respect of policy QSS1 above.

Policy QH2 and paragraphs 8.3.2.3 to 8.3.2.4

The policy and paragraphs should distinguish between Somme Road and Poppyfield Meadows for the reasons set out in the comments in respect of paragraphs 6.2.4 to 6.2.7 above.

8.3.5 Housing mix for new development

Policy QH4

You may wish to consider whether it would more appropriate to apply this policy to the village of Quarndon, rather than any development of strategic sites that may take place on the edge of Derby within the parish, the provision of which would be to either meet housing need within Amber Valley as a whole, or unmet need arising within Derby City.

8.3.7 Transport and parking

Paragraphs 8.3.7.1 to 8.3.7.4

It may be helpful to refer to the maximum parking standards of Derbyshire County Council within one of these paragraphs.

8.4.5 Reuse of Buildings for Employment Purposes

Policy QCLE4 and paragraph 8.4.5.1

It may be helpful to include more details regarding the national standards for sustainable construction in either the policy or the paragraphs.

8.6.1 Introduction to the Rural Character, Heritage Assets and Environment Policies

Paragraph 8.6.1.3

This paragraph will need to be amended to refer to the Screening Determination in relation to the need for Strategic Environmental Assessment (SEA).

8.6.4 Views

Policy QEN3 and paragraphs 8.6.4.1 to 8.6.4.3

You may wish to consider whether there is any evidence in relation to landscape character that would support the protection of views into, out of and within the parish.

8.6.5 Dark Skies

Policy QEN4

It is not clear where the definition of dark at night being more than 50m from an existing street light comes from.

I hope the above comments are helpful to you and should you wish to discuss any of them in more detail, please let me know.

Yours sincerely

A handwritten signature in black ink that reads "Derek Stafford". The script is cursive and somewhat informal.

Derek Stafford
Assistant Director (Local Plan Manager)