

PRIVATE & CONFIDENTIAL

Mrs L Storey
Hazelwood Parish Clerk
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Dear Mrs Storey

Localism Act 2011 – Strategic Planning Comments**Hazelwood Neighbourhood Plan 2016-2039 5-year Review: Pre-Submission Consultation 2022**

Thank you for consulting Derbyshire County Council (DCC) on the Hazelwood Neighbourhood Plan 2016–2039 5-year Review: Pre-Submission Version 2022 (HNP). The comments below are DCC's Member and Officers' technical comments with regard to the climate change and transport aspects of the Plan, followed by comments on specific policies.

Local Member Comments

Councillor David Taylor, the County Council Member for Alport and Derwent Electoral Division has been consulted. He has commented as follows:

'I fully support neighbourhood plans so I am happy to back this'.

Officer Comments**General****Climate Change**

Generally, the HNP is very light on references to climate change mitigation, adaptation and resilience, the bulk of which are included in the 'Hazelwood Village Design Code for new build houses and extensions to existing houses'. DCC would suggest that the issue should be highlighted, and would be greatly strengthened, by including it as a separate chapter in the HNP itself, outlining the requirements for climate change mitigation, adaptation and resilience, and including measures that would be required in new build developments and supported in terms of retrofitting to the existing building stock (see further comments below). The neighbourhood plan is an ideal opportunity for the community to influence the way in which they would like to see such measures introduced and how this could be achieved without detriment to local character.

The inclusion of climate change measures in an appended design code risks dilution of the efficacy of the plan, relying, as it does, on the related policies containing the wording "...in accordance with the key principles in the Village Design Statement, where applicable." More weight would be given to these issues if they were to be included as specific policies within the Plan itself.

Such matters as energy efficiency, low carbon building materials and methods, renewable energy generation, solar gain and mitigation/cooling, etc. should form part of the neighbourhood plan policies requiring high standards of efficiency, suitable renewable energy generation and biodiversity gain as a matter of policy. While it is accepted that the Plan anticipates few new dwellings over the plan period, this should not undermine the importance of ensuring that all new development achieves high standards of climate change mitigation, adaptation and resilience and acknowledges the importance of biodiversity in enhancing and maintaining a sustainable and healthy environment.

Dark Areas and Dark Skies

Both the policies and the Village Design Statement omit any reference to reducing light pollution, which can have a significant and detrimental impact on local character – urban and rural. It should also be recognised that lighting can be detrimental to biodiversity, impacting on nocturnal species including bats, birds and many species of insect, and that exposure to artificial lighting is increasingly being recognised as having adverse impacts on mental and physical health. Any proposals to install lighting in areas of the Parish that are currently dark at night should be resisted, unless such proposals are demonstrated to be essential for road and/or pedestrian safety. DCC would suggest, therefore, that a policy seeking to preserve natural dark areas and dark skies should be included in the Plan. With the advance of low energy and therefore low-cost LED lighting, it is increasingly important to stress the need for control of external lighting to preserve natural character, biodiversity and human health – see, for instance, the ‘Dark Skies’ policy in the Ashover Neighbourhood Plan (page 48) [Microsoft Word - Ashover Neighbourhood Plan Referendum Version - incorporating examiners recommendations final \(ashover-pc.gov.uk\)](https://www.ashover-pc.gov.uk/Referendum%20Version%20-%20incorporating%20examiners%20recommendations%20final%20(ashover-pc.gov.uk).).

Paragraph 180 of the Village Design Statement and Design Code identifies that traditional sandstone and dry stone walls are a feature of the parish, yet policy ‘NP5: Maintaining and enhancing the Parish’s biodiversity’ states in point 2 that “Development proposals must include native hedgerows on site boundaries unless the biodiversity benefits of an alternative treatment would have a similar benefit or outweigh that of a hedgerow.” Later, policy ‘NP6: Protection of landscape character across the Plan area’ requires that any proposal “conforms to the principles of the Village Design Statement” (which states a preference for walls). These policies conflict with one another.

DCC would suggest, therefore, that policy NP5 (and policy NP2 in relation to tree planting) should be amended to reference biodiversity net gain requirements rather than stipulate the inclusion of hedgerows. While tree and hedge planting is generally supported, it should be recognised that tree planting is not the only way to improve biodiversity, nor is it always appropriate. The policy should therefore be amended to require native hedge planting where appropriate, and that fencing should be avoided, natural stone walling and hedging being the preferred options.

Village Design Statement and Design Code

29 Hazelwood Village Design Code for new build houses and for extensions to existing houses, and

30 Practical issues to future development

No mention is made of renewable energy generation in relation to existing homes, new extensions or new builds or at a larger scale, e.g., wind turbines or solar arrays. DCC would suggest that a policy covering these aspects should be included in the Plan. This could also cover support for community renewable energy generation schemes

Although the Design Code provides some information on future development, DCC would prefer to see more guidance, e.g., ‘BREEAM excellent’ or ‘Buildings for Life’, to ensure

that new homes and buildings are constructed that demonstrate sustainable use of resources and high energy efficiency standards. Given the current energy crisis and long-term climate change, it would be preferable to see policies which encourage the sensitive retrofitting of energy efficiency measures

DCC would suggest including policies and policy statements which reflect the need to respond to future climate conditions, and which avoid and reduce flooding and can cope with extreme weather events. For instance, a policy to ensure that new buildings, including residential extensions, are designed and built to cope with anticipated climate change including higher summer temperatures and other extreme weather and which promote water efficiency by incorporating rainwater harvesting technology, should be included in the Plan.

Transport

Whilst acknowledging the essentially rural nature of the parish, the desire to retain the character of locality, and the assumption that any development will be minimal and incremental, the only reference to transport in the plan is that included in paragraph 57, and Community Objective 7. The latter concentrates solely on the provision of bus services, and concerns with speeding.

DCC would suggest, therefore, that other transport issues (see below) should also be considered in the HNP 5-year review and policies developed and included accordingly.

Active and Sustainable Travel

Consideration should be given to exploring the viability of alternative rural transport solutions wherever appropriate and where funding becomes available. This could include:

Demand responsive transport (DRT). The Government definition of DRT is: ...a flexible service that provides shared transport to users who specify their desired location and time of pick-up and drop-off. This can complement the provision of traditional bus services.

Shared mobility. This often involves the sharing of a car or cars amongst a local community, on a pay-as-you-go basis. This reduces the financial burden of car ownership, typically the need to own and run a second car. Shared mobility can also be extended to shared use of bicycle, particularly e-bikes.

Car Club. As shared mobility above, albeit provided by a commercial operator. Appropriate examples include [Co-Wheels](#) or [Enterprise Car Club \(Buxton\)](#).

Development issues

Whilst acknowledging that any development will be minimal and incremental, the following should be borne in mind, and included as policy requirements in the HNP:

Any development, including new, replacement or extended dwellings, should include the provision of electric vehicle charge points, to promote the uptake of low emission vehicles and reduce emissions and noise associated with road traffic.

Similar consideration (i.e., provision of electric vehicle charge points) should also be given to any commercial or employment related development, where such development is permitted.

Developer (Section 106) contributions

DCC would suggest that the HNP should include a policy requiring developer contributions for approved development to contribute to the provision or enhancement of active and sustainable travel infrastructure wherever appropriate, e.g., provision or upgrading of bus

stop infrastructure, pedestrian walkways or similar pedestrian improvements (wherever appropriate), or multi-user trails. (see note below in relation to the local cycle network).

Ecclesbourne Valley and the Midshires Way

Parts of both of the above routes run within the parish and are highlighted as potential local cycle network (LCN) routes by Derbyshire County Council. Such routes provide links to other neighbouring centres for both utility and leisure journeys. This can potentially open up opportunities for Hazelwood residents without access to a car, reduce reliance on (sparse) bus services, improve air quality and reduce noise and congestion from road traffic.

The HNP should acknowledge the development of these routes and the part they can potentially play for the improvement in the health, economic and social wellbeing of Hazelwood residents. They should be referenced in the text and highlighted on Map 8. Every available opportunity should be taken to both improve the routes themselves and links to them. This is likely to be via developer contributions, although other rural connectivity-related funding should be considered whenever this becomes available.

Specific Policies

9. The Importance of good design in new development

NP1: Support appropriate new build homes, extensions and ancillary buildings

The Plan's approach to new housing development is set out in section 9. The policy approach is considered to be well justified by a range of supporting evidence in this and earlier sections. Given the rural nature of the Parish and the small-scale nature of the seven settlements, the Plan's positive approach to support new housing development of a limited scale (single dwellings and extensions) is considered to be appropriate and well justified.

The Adopted Amber Valley Local Plan (2006) does not define settlement framework boundaries for settlements in the Borough. There may be an opportunity, therefore, for the HNP to consider defining a settlement framework boundary for the two largest settlements of Hazelwood Hill and Hob Hill, which could assist in providing for a more robust and clear policy approach to guide the suitable and sustainable location of new housing development to within the defined settlement development boundaries, as set out in Policy NP1.

Given that parts of the HNP boundary are covered by Green Belt, it is appropriate and supported that Policy NP1 (d) makes reference to Green Belt and the need for development proposals to accord with national and district policies for the Green Belt.

12. Supporting a prosperous rural economy

NP9: Improving the provision of broadband

Superfast broadband is now an outdated infrastructure technology and is being phased out by telecommunications suppliers. DCC would therefore recommend that the HNP should reflect aspirations to support the latest technology - Ultrafast, Gigabit- Capable, Full Fibre broadband – and that the policy and supporting text should be amended accordingly.

13. Enhancing the provision of community facilities

NP10: Enhancing the provision of community facilities

Whilst reference is made to community facilities, DCC would recommend that the policy should be amended to ensure that any current and future proposals should include the

provision of ultra-low emission vehicle and e-bike charging points, available for both the public and staff.

Minor Comments

Map 3 Key Landscape (typographical error)

Paragraph 54 and Table 3: First results from the 2021 Census have now been released, and DCC would suggest updates to the paragraph and table if they are available.

Paragraph 66 and below paragraph 75 – employment at Lubrizol is given as 380, but paragraph 134 states the number is ‘around 350’.

Derwent Valley Mills World Heritage Site (DVMWHS)

The parish lies on the very edge of the DVMWHS Buffer Zone, and where there is overlap it often also includes other protected designations such as Green Belt or a Special Landscape Area. DCC therefore has no DVMWHS-related concerns over this update.

Highway Development Control

DCC has no significant land use or transportation-related concerns in relation to the HNP.

Education

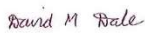
It is a small area with no schools within it, and all parts of the area feed to a single primary and single secondary school.

Landscape Character

DCC has no comments to make on this aspect of the Plan.

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

Yours sincerely



David M Dale

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Planning Sub-Group