

## 1. Consultation

Regulation 14 (a) of the Neighbourhood Planning Regulations requires that the proposals should be publicised “in a manner that is likely to bring it to the attention of those who live, work or carry on business in the neighbourhood area” and regulation 14(b) requires the qualifying body to “consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests they consider may be affected by the proposals...”

The requirements of regulation 15 (2) (a) and (b) of the Neighbourhood Plan Regulations are that the Consultation Statement should contain “details of the persons and bodies who were consulted about the proposed neighbourhood development plan” and “explain how they were consulted”.

I should be grateful if two aspects of these requirements could be clarified:

(i) While the Consultation Statement refers under Section 7.2 to engagement with businesses prior to the regulation 14 consultation, it is not explicit about measures taken to publicise the pre-submission draft to businesses or their employees.

(ii) While it is evident from the responses to the regulation 14 consultation that at least some of the organisations listed in paragraph 1 of Schedule 1 of the Regulations were consulted, the Consultation Statement does not clearly identify which organisations were consulted at this stage.

The Parish Council have confirmed that the Plan proposals were publicised in a manner that is likely to bring it to the attention of those who work or carry on business in the neighbourhood area in the following way:

Analysis of employment type in the Neighbourhood Plan area, and work through the Neighbourhood Plan Business and Trade Working Group, which itself included a range of local business people, had revealed that the vast majority of residents’ work outside the plan area, and that the plan area contains few dedicated business premises. Nearly all of the businesses in the area are home based in residential property; or are live-work premises such as the Post Office, tourist accommodation, and public houses; or are family run farms. All of these business interests, that are an integral part of the local community, are necessarily simultaneously covered by consultation with residents. The extensive publicity of the regulation 14 consultation including on the dedicated website; through an article in the Crich Area Community News; through display of posters on noticeboards and in business premises; through four well publicised drop-in events; and through leaflet distribution to individual premises served to draw attention to the Plan proposals of all people who live or carry on business or work in the area. Less tangible, but equally as important and effective, was publicity of the draft Plan through word of mouth existing local networks.

The reference to leaflet distribution during the Regulation 14 period in the Consultation Statement included a typographical error. The reference to households should more accurately have referred to premises or addresses. Leaflets explaining the Regulation 14 consultation, and giving details of drop-in sessions and where the Plan document could be viewed as hard copy or on line, were delivered to premises in the neighbourhood area from which the following businesses operate:

Ade Smith - Painter & Decorator

Ambervale Heating

AR Footcare

Avista - at Penrose

Beauvamp

Bax-Car

Cardale Fish Bar

CHIKS Project

Cliff Inn  
Cliffside Carpets  
Cliffside House  
Clive Yeomans  
Crich Area Community News  
Crich Butchers  
Crich Careline  
Crich Environment, Health & Safety Training  
Crich Hair & Beauty  
Crich Post Office  
Crich Pre-School  
Crich Stand Tea Room  
Crich Tramway Village  
Designed 2 Move  
Fantastic Greetings Cards  
Frank Daniels - Hypnotherapy  
GH Productions Ltd  
Gill Wilson  
Ginger Mats Ltd  
Glebe Field Centre  
Gwyn Carless Designs Ltd - Lighting  
Halcyon Cottage  
Hartshorne's Farm Eggs  
Home Help services  
Hoppingham Palace  
Hotelforce Ltd  
Hub3 Limited  
Intel Kitchen & Home  
Irene Brierton - Wildlife Artist  
J Greenhough & Son - Plumbing  
Jackson Interiors  
James Wetton - Electrician  
Jeera - restaurant  
Jog Derbyshire  
JW Computer Training  
Karen Cox  
Katie Custard  
Ken Holmes - Builder  
Kevin Bown – Decorator  
Leivers Electrical  
Live and Local  
Love Hector's Emporium  
Lynda Pedley Interiors  
Mark Wright - Builder & Joiner  
Martyn Dranfield - Plumbing / Gas fitting  
Martyn Newman - Optician  
Maths tuition  
Mobility Driving School  
Mount Tabor House  
Moylan Electrical Ltd  
Nisa supermarket

Oakford Cottage  
Oakford Cottage Tea Rooms  
P A Simms - Electrician  
Parallel Associates  
Park Farm B&B  
Paul Smith  
Paul Whittaker Plumbing  
Peat Park Renovations  
Petcare at Home  
Planning and Management Ltd  
Qi to Health  
RAM Furniture  
Red Lion  
Ric's Autospares & Repairs  
Richard Critchlow - Electrical Services  
Riverdale  
Safehands Roofing & Construction  
Sewing Alterations & Repairs  
KT Shakespeare Milliner  
Slimming World  
Soundgas  
Spinney Farm Cattery & Kennels  
Squarechilli  
Standcliffe House  
Standcliffe Mews  
Sunbrite Cleaning  
Supporting Solutions  
The Black Swan  
The Briars - Catholic Youth Retreat Centre  
The Comrades Club  
The Family Tree  
The Kings Arms  
The Loaf  
The Mobile Framer  
The Penny Drops  
The Old Sawmill  
Vincent Harlin - Remedial Massage  
Winning Works Ltd

In addition leaflets were delivered to farms many of which are agricultural enterprises.

Businesses were also consulted through the 'Crich Business Group' a body that is referred to in the Consultation Statement. The regulation 14 consultation was brought to the attention of Crich business group members at meetings, one held during the Regulation 14 consultation period, and through email notification.

In addition, umbrella employer organisations namely the Home Builders Federation; East Midlands Chamber of Commerce; the Federation of Small Businesses; Amber Valley Centre for Voluntary Services; and the D2N2 Local Economic Partnership (all referred to below) were directly consulted.

## 2. SEA Screening and Determination

It is evident from the Amber Valley (AVBC) website that a SEA Screening Assessment was prepared in February 2017 and a Determination that an SEA was not necessary was made on 31 March 2017. This gives rise to two questions:

(i) These documents are not included in the list of submission documents on the AVBC. Regulation 15 (1) (e) requires the submission of “an environmental report...or where it has been determined under regulation 9(1) (of the Environmental Assessment of Plans and Programmes Regulations 2004) that the plan proposal is unlikely to have significant environmental effects ....a statement of reasons for the determination.” Was the Determination which contains a statement of reasons for it one of the submission documents?

## 3.

Yes the Determination was a submission document. I attach a copy of the letter from the Parish Council which lists the submission documents.

(ii) The Consultation Statement refers to a significant change to the Draft Plan to change the Settlement Boundary in response to comments of AVBC. Was there any explicit consideration of whether this had any implications for the determination made earlier?

The Borough Council highlighted concerns that the Settlement Development boundary excluded Land at The Common Crich, which is a proposed housing growth site within in the emerging Local Plan. In response to these concerns the Settlement Development Boundary was changed.

As the impacts of development arising from the proposed housing growth site have been assessed and considered through the Sustainability Appraisal process and Habitat Regulations Screening Assessment (May 2017) it was considered that no changes were required to the SEA screening determination. Details of which can be found on the Borough Council's website via the following link [www.ambervalley.gov.uk/localplan2016](http://www.ambervalley.gov.uk/localplan2016)

## 4. The paragraphs preceding Policy H1 in the adopted Amber Valley Local Plan, refer to four sub areas but I have not been able to find how these are defined, and, in particular in which sub area Crich falls.

There is a map in the Adopted Local Plan, between Chapter 8 and Appendix 1, which shows the defined Sub-Areas and the inclusion of Crich Parish within the Belper-Ripley Sub-Area. However, for some reason, this map is not included within either the Written Statement or the Proposals Map as hosted on the website. I therefore attach the map. The Sub-Areas were defined in the Derby & Derbyshire Joint Structure Plan 2001 and were generally based on Travel To Work Areas identified at that time.

## 5. Derbyshire County Council has questioned whether the settlement Boundary for Crich includes the recent permissions at Roes Lane as “the redline boundary has not been drawn around these sites.” A comparison between Map 7 and Map 6 suggests that the southern part of the area where development has been permitted has been excluded. This area is enclosed by a dotted line on the maps on pages 40 and 42 of Settlements in the Landscape. If this area is part of the area where development has been permitted, why is it excluded? There also seems to be an error as there is a red line running along the south side of Roes Lane and to the east of the northernmost dwellings on Hill Crest which separates the Roes Lane from the rest of the area within the settlement boundary. It would be helpful if I could have the application reference numbers for these applications.

Map 7 should be amended to be consistent with Map 6, to include within the settlement boundary (red line) the three planning permissions on land south of Roes Lane. The relevant application numbers and the respective number of dwellings for each application are as follows:-

AVA/2016/0339 -108 dwellings (Reserved Matters)

– note this number is reduced from 113 dwellings anticipated at outline planning permission stage - see comments in relation to 3 below)

AVA/2016/0464 – 60 dwellings (Outline)

AVA/2016/1277 – 8 dwellings (Reserved Matters)

6. There appears to be some ambiguity between paragraph 88 and Table 7 regarding the number of houses. Paragraph 88 refers to “three permissions ...to build 181 homes on land off Roes Lane. Table 7 includes the figure of 181 apparently in relation to the Parish as a whole. If this is the case does the figure 181 include the “16 new homes on land off The Common in Fritchley” and where is the development permitted in the area to the south of Stones Lane, coloured light blue on Map 6 taken into account? Is this the 18 dwellings at Coast Hill referred to in paragraph 15 of the CPC response to The comments of AVBC in its Regulation 16 representation? A table showing all the permitted locations for development and the proposed strategic allocation, together with the number of dwellings permitted or envisage in each location would be very helpful as this information appears in various places in the documentation but is not drawn together anywhere.

The figure of 181 dwellings should be amended to 176 dwellings, which represents the total number of dwellings to come forward in accordance with the three planning permissions referred to in my comments in relation to 2 above. The total figure does therefore not include the 16 dwellings at The Common, Fritchley or the 18 dwellings at Coast Hill, Crich (which does correspond to the area south of Stones Lane coloured light blue on Map 6. Table 7 should also refer to later date than ‘May 2016’ for the ‘Approved Planning Permissions’ column – I would suggest ‘April 2017’. An additional table can be provided listing the relevant planning permission, together with the proposed Housing Growth Site in the Local Plan at The Common, Crich (65 dwellings).

7. Representations by AVBC and P& DG on Behalf of Wheeldon Brothers Limited refer to a disparity between the proposed settlement development boundary for Crich and the area of the strategic allocation proposed in the Pre-Submission Draft of the Amber Valley Local Plan. I should be grateful if I could be provided with a map showing this area as I could not locate it on the AVBC website. Appendix 3 is headed Proposals Map but as far as I could see the map is not available. It would also be helpful to see the extent of the Special Landscape Area in the emerging plan.

The Proposals Map, as set out as Appendix 3

<http://info.ambervalley.gov.uk/docarc/docviewer.aspx?docguid=52c59259ea9e42e99494434e93d696c3> in the Pre-Submission Local Plan, consists of a series of plans, which include a)

a) a plan showing the extent of the proposed Housing Growth Site at The Common, Crich and b) the proposed extent of the Special Landscape Area – note this is as per the extent in the Adopted Local Plan and can therefore also be viewed on Insets G to I of the Proposals Map of the Adopted Local Plan as it applies to Crich Parish

<http://www.cartogold.co.uk/AmberValley/ambervalley.htm>

8. Policy NP 3.3. Relates to the gap between Crich and Fritchley but the third sentence refers to the gap between Fritchley and Bullbridge which is the subject of NP 3.4. Is this an error?

This has been confirmed by the Parish Council to be a typographical error.

Policy NP3.3 should relate to the gap between Crich and Fritchley. The third sentence of Policy 3.3 should refer to the gap between Crich and Fritchley.

9. Paragraph 153 refers to the “Addendum SHMA 2017”. I have looked for this on the AVBC website in the Local Plan section under “useful documents” but failed to locate it.

The relevant document can be located in the Local Plan section of the AVBC website under ‘Local Plan Evidence Documents’. The link to the document is given below:-

<http://info.ambervalley.gov.uk/docarc/docviewer.aspx?docguid=64ec3b5c138246b8a96b9197ec218d6a>

## **CRICH PARISH COUNCIL**

Glebe Field Centre,  
Glebe Field Close,  
Crich

Derbyshire  
DE4 5EU

[crichparishcouncil@btconnect.com](mailto:crichparishcouncil@btconnect.com)

01773853928

14<sup>th</sup> September 2017

D. Stafford  
Assistant Director (Planning and Regeneration),  
Amber Valley Borough Council,  
Town Hall,  
Ripley,  
Derbyshire  
DE5 3BT

Dear Mr. Stafford,

### **Crich Parish Neighbourhood Development Plan**

Crich Parish Council as Qualifying Body for the Crich Parish Neighbourhood Development Plan is pleased to submit the Plan to the Borough Council for completion of its final stages up to achievement of 'made' status.

In accordance with regulation 15 of the Town and Country Planning England Neighbourhood Planning (General) Regulations (as amended) the following documents are submitted on the enclosed memory stick:

- Crich Parish Neighbourhood Development Plan 2017-2031 Submission Version (that includes a map of the Neighbourhood Area.)
- Crich Parish Neighbourhood Development Plan 2017-2031 Basic Conditions Statement
- Crich Parish Neighbourhood Development Plan 2017-2031 Consultation Statement
- The Environmental Assessment of Plans and Programmes Regulations 2004 Regulation 9 Screening Determination: Crich Neighbourhood Plan 2017
- Crich Parish: Villages in a Landscape – Appraisal and Policy Guidance October 2016 (as amended)
- Crich Parish Neighbourhood Development Plan Non-designated heritage assets report 2017
- Crich Parish Neighbourhood Development Plan Local Green Spaces Report 2017

In addition, the Crich Neighbourhood Development Plan evidence base is available at [www.crichparishnp.org.uk](http://www.crichparishnp.org.uk)

The Parish Council request that the publicity stage under Regulation 16 should be commenced as soon as possible.

The Parish Council look forward to receiving your request for agreement to the appointment of a suitably qualified and experienced person to undertake the Independent Examination of the Neighbourhood Plan.

Yours sincerely,

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Margaret Lane (Chair)

Enc.

# AMBER VALLEY BOROUGH LOCAL PLAN

## Adopted 2006

### SUB-AREAS

