

Hilton Parish Council Objection

DMPA/2019/1143 Land at SK2531 3702, Lucas Lane, Hilton, Derby

The planning application for 57 houses on the Lucas Lane site falls short of the standard of submission that ought to be made for a proper evaluation of the proposal to be made. These shortcomings will be detailed below.

The fundamental objection to this application is that it does not conform with the Hilton, Marston and Hoon Neighbourhood Development Plan (NDP). The NDP has a specific policy that covers this site, which was formulated on the basis of the survey results from residents and their endorsements of the policies. The NDP is currently under Regulation 14 Consultation and to date 90% of the respondents have indicated their support for the plan and hence the policy addressing Lucas Lane.

Lucas Lane is a valued community amenity. It is used by walkers, dog walkers, cyclists, runners and as a safe route for schoolchildren on their way to and from John Port school. The Parish Council is working with SDDC to open up the "Path to Nowhere" (from Egginton Road, by Lucas Lane, to the Greenway) which would extend the safe, off-road, walking route for children going to, and from, John Port School into the heart of the new part of the village. This would also provide all residents another alternative walking route

This development conflicts with NDP policies T1 (Active Travel) , T2 (access to Schools) and T3 (Cycle Paths)

Lucas Lane features pleasant views of neighbouring green fields and in spring is first lined on both sides by massed naturalised snowdrops in February, these are followed by daffodils and then bluebells then tulips. Nature takes over later and the display carries on with cow parsley and meadow sweet and is added to when the hawthorn blossoms in May. This is a real asset to the village where residents can walk with children and grandchildren and cycle appreciating the beauty of these flowers close up.

Its character as a country lane cannot be mitigated by condition only destroyed by unnecessary development.

A survey conducted in November 2019 received 201 responses, 176 from people living in Hilton, but not on Lucas Lane supporting and emphasising the unique amenity value of the lane. Key words expressed in the comments : safe, peaceful, natural, green, children, open space. Concerns were expressed over the width of the lane and its ability to cope with more cars, delivery vans, trucks etc, and that it would become more dangerous for its amenity and well-being use.

One-third of respondents use the Lane more than once per day, and three-quarters more than once per week. 40% of the usage is during peak times.

It is in contravention of SDDC Policy SD1 " The Council will support development that does not lead to adverse impacts on the environment or amenity of existing and future occupiers within or around proposed developments".

It is also not compliant with policies E1, E3 and E5 of the Neighbourhood plan.

The Lucas Lane site does not appear in the allocation of housing in the Local Plan and with the current status of South Derbyshire's five year housing supply being in compliance, there is no need

for extra sites to address a shortfall. If the projected build rates within South Derbyshire are achieved over the next five years, then no extra sites to those contained in the Local Plan will be necessary and specifically, there is no need for this proposed development.

Traffic

The Transport Statement prepared by Systra contains a traffic survey of Egginton Road for 5th July 2018.

Hilton Parish Council commissioned its own traffic survey carried out by Derbyshire County Council from 26th June to 2nd July 2018, so a meaningful comparison can be made. What is evident is that the Systra survey has far lower traffic flows.

At peak times the volume of traffic is underestimated by between 5% and 16%. The Systra document contains a forecast for traffic growth to 2023. It is clear that the traffic volumes today are already at the 2023 level forecast by Systra. This will clearly increase the forecast by Systra of queuing times of traffic leaving Lucas Lane.

There is no speed survey of traffic on Egginton Road in the Systra document and unfortunately the Hilton Traffic Survey (HTS) did not measure speeds along this section of Egginton Road. Systra use the fact that there is a 40mph speed limit to demonstrate that the visibility splays from the junction are OK. What the HTS does show is that on other roads with a 40mph limit in Hilton (Derby Road and the Mease) 25% to 50% of the traffic exceed the speed limit. It is reasonable to assume that the speeds on Egginton are similarly higher and hence the visibility splays may be inadequate.

A proper speed survey needs to be undertaken.

Swept Analysis

There is no proper swept analysis in the Systra report. What it claims to be a swept analysis is only for the junctions from the site onto Lucas Lane. A swept analysis needs to be provided for the bin lorry for the new layout as the tightness of the bend on Street 2 has been increased. This may be unacceptable when combined with the parking issues below. The top end of Lucas Lane should also be subjected to a swept analysis as currently it is unsuitable for two-way traffic.

Parking

The Site Layout submitted is of particularly poor quality, but it would appear that 100 parking spaces are provided for the 57 houses.

The NDP policy on parking requires one parking space per bedroom up to 3 bedroom houses, which for the housing mix proposed means that 133 parking spaces should be provided.

Furthermore, the parking survey undertaken for the NP also reveals that if the parking spaces that are provided are either remote from the house or are of tandem nature then this leads to an on-road parking problem. Nearly 50% of the parking spaces provided are either remote or tandem. This will undoubtedly lead to on-road parking, particularly along Street 2, which combined with the tighter bend on Street 2 may make access for the bin lorry too difficult.

Overlooking/Overbearing

There are no house elevations provided with the application so it is not possible to say where windows are located on the proposed properties. However, the proposed layout indicates that there is a potential overlooking or overbearing problem (as defined in the South Derbyshire Design Guide)

for properties located at 134a Derby Road and 19 Normandy. Plots 33 and 40 on the proposed development are each approx. 6m away from the respective existing houses. These plots need to be either removed or located at least 12m and maybe 21m from the affected properties to comply with the South Derbyshire Design Guide policy on Overlooking/Overbearing and BNE1 (h).

Noise Assessment

The noise assessment presented in the documents is dated March 2019, and does not model the current proposed number and layout of houses. The noise assessment was May 23rd – 30th 2018 over the weekend, bank holiday, and into school half term, and is not a representative period. This questions the validity of the underlying data on which the whole assessment is based.

The noise assessment concludes that it is a medium risk as defined in the PropPG guidelines on “Planning & Noise”. The same guidelines state that, with such a risk, *“the examination of acoustically critical issues such as site layout, building heights, materials, landform contouring, detailed design and landscaping, the location of vehicle and pedestrian access, boundary treatments, amenity spaces etc. should not be left for agreement at a later stage. Any changes in acoustically critical issues following grant of outline consent should be fully assessed in an ADS.”*

There are no details of the housing design, which would successfully mitigate the level of measured noise, nor thermal modelling which will inform the materials to counter the likely over heating risk due to the need to keep windows closed. This has explicitly been deferred to the detailed design stage, contrary to ProPG guidelines.

The assessment assumes that all occupants will have “normal sensitivity” to noise. Given the ageing population in the village, and the higher than average incidence of autistic children in the Derby area, then this development is in contravention of ProPG guideline 2.66

Pedestrian access

The Systra travel plan assumes that the 280m gap in the footpath to access this development will be constructed on Council land. If this is not achieved then there would be no safe access to the housing development.