

Brailsford and Ednaston Parish Council

Response to NP Preliminary Enquiries

1. The Plan Period

Comment noted and accepted. This will require further amendments to the text. However this has been a feature throughout the Plan preparation period because of the long delays built into the process – the last being information received from DDDC that all work on Neighbourhood Plans was suspended because of the pandemic (Spring 2020 on a 2019 submission) with the consultation only starting in the Autumn 2020.

Your advice is therefore sought on when these changes should be made and the status of the document fixed?

2. Location Maps

- **Plan 1.** Point agreed.
- **Plan2:** Purpose to locate Brailsford & Ednaston specifically in relation to neighbouring parishes.
- **Plan 3:** Agreed
- **Plan 4:** Agreed.

3. Introduction

- **Plan References.** Agreed – when should this be done.
- **P14 Ref to 80%.** This still seems clear from the context. However for additional clarity it could be linked to the debate and approval of the Derbyshire Dales Local Plan in 2017.
- **Plan 5 Title.** Agreed
- **Statement relating to hectareage.** Not clear on the purpose of this point as it has already been stated and clarified that the civil Parish boundary and NP area are aligned. Additions can be made to reflect the comment on p9
- **LA observations on confusion between census data and Parish survey data.** Section reviewed but unclear about the purpose of the point. References to census data or Parish survey have been made for each point. However, information could be added to figure titles to add further clarification.
- **Figure 6 Title:** Agreed.
- **Plan 6: Agreed.** Supplied by Local Authority – represent as full page?
- **Figure 10:** Agreed to be amended.

4. Policy Context

- **Footnote:** Agreed. When should this be done?

- **Settlement Hierarchy and Associated Documents such as a Climate Change Action Plan.** Agree document should be updated to reflect these changes as we believe they add significant weight to the propositions (objectives) of the Neighbourhood Plan.

We should like you to consider these in relation to self-containment. If this is to imply that every effort should be made to protect the village from becoming entirely a 'dormer' settlement, then the impact of current growth and the potential for further development (as is seen to be proposed by some respondents to the Plan) have to be balanced. There are indeed limited facilities and limitations on their growth.

There are few opportunities for growth in the types of employment favoured in the survey, with no designated employment sites or the development of live work space in our Parish. While this scenario may have been tempered by the outcome of the Covid-19 pandemic with a greater move towards home working, this must surely be balanced against the aspiration of the Local Plan to 'protect and improve environmental (and historical) assets' such as the nature of the landscape surrounding the village and the importance of its Conservation area – which your respondents to the Plan and associated comments seem to downgrade.

Likewise the Local Plan definition of a Tier 5 settlement does not seem to align well with the proposals contained in your report for potential developments in Ednaston.

The 2020-2030 Climate Change Action Plan – Path to Net Zero while focusing on the Council's own activity should surely mean that greater weight is given to the achievement of Net Zero across all development as reflected in PD7. Unfortunately throughout the preparation of this Plan, and as highlighted particularly by the lack of conditions placed on the current developers, the Parish Council and the NPWG do not consider that the Planning Authority places sufficient emphasis on the achievement of these policies and wishes this to be reinforced in our own aspirational Plan.

These requirements should be reinforced by the SPD relating to Climate Change now out for consultation – however although the situation may be improved by timing we see no reason why re-emphasis in our Plan should cause difficulty (as was confirmed by a DDDC officer in the last consultation with them).

5. **How This Plan Was Made.** Agreed

6. **Vision and Objectives**

- **Bullet 1 Vision Statement.** The Local Authority comment lies at the heart of the concern of the Parish Council and the Working Group throughout. A level of development was originally proposed for our Neighbourhood Plan but was at odds with the requirement of the Local Plan as it was re-versioned and was therefore required to be removed.

We believe that Brailsford is now at the maximum that should be considered to retain a 'village' structure – see Local Plan policies for Rural Villages S8 and S9. Perhaps this should statement include *'That the Planning Authority and the Local Plan conserves.....by identifying an optimum (and its form) for the designated Neighbourhood Plan area which.....etc;* and that this is in line with the ambition of the revised settlement hierarchy statement and Policies S8 and S9 (see above).

The failure to determine an 'optimum' development number in relation to the baseline and the amenity/employment opportunity has been seen as a weakness throughout but the requirement for this target which can be debated and substantiated is essential, especially should the proposals set out in the recent White Paper be brought into force.

- **Priority 1:** Please note that the Neighbourhood Plan has had many iterations during the course of its preparation with its progress delayed significantly by the responses and response times applied by the District Council, whose priority was clearly on the completion of the current approved Plan. In 'managing any local expansion' we would wish to see the clarity described in the paragraph above. During the Plan's preparation various Council officials/officers have offered the opinion that the SHLAA and the development proposals of the original Plan were at a level which was optimal for Brailsford. In fact this was recognised by the refusal for permission for a further 35 houses (in an estate of 75) subsequently granted by a Planning Inspector at Main Road, Brailsford.

The 'fallouts' from this decision - which clearly exceeded the Planning Authority's view on meeting the expectations of the settlement hierarchy – are still being felt in the village with surface water flooding and sewage problems created by the extra volumes, alongside ongoing traffic management and pedestrian safety issues which remain the subject of disputes with the developer.

- **Priority 4.** In the light of the above the Parish Council wishes to see infill development being given priority for the future. Use of the term 'recommending' was reached as a consensus from expert input given to us.
- **Priority 6:** We strongly believe (and understand from experts that such measures have been successfully encouraged elsewhere) and that every development should be required to consider within a sustainable Travel Plan, traffic management measures consistent with existing conditions on the ground. For example:
 - The village lies alongside the busy A52 carrying traffic from the expanding town of Ashbourne, and HGVs for local quarries and other employment sites in the District. While more home working may reduce local traffic movements, present experience shows that the residents of the Neighbourhood Plan area rely heavily on the use of private cars (most households have at least 2) and that the majority of traffic has to enter the A52 at some point.
 - The proximity of the Acorn Meadows development on Luke Lane to the new primary school and access onto a road carrying an abnormally large number

- of HGVs for its size and designation (route to local quarries and aggregate manufacturing plants).
- Access for the Cotton Yard site at Main Road has an access (width already queried) onto the A52 reasonably close to 2 busy junctions (new housing estates/GP surgery) and just away from a corner
 - Bus services on supported routes being withdrawn for lack of funding and patronage as a result of the pandemic - even as the new developments become occupied. Information from DCC discussion suggests that even less funding will be available for the supported public transport network in the future

All this requires the relevant Authorities to be rigorous in their assessments and, instead of considering each site as an entity, to insist on the Travel Plan taking cognisance of other developments within a given radius. P28 of the SPD on Developer Contributions make investment here clear but our emphasis is on the need for the impacts of development site to be taken as a piece – not in isolation – and for this assessment to include boundary issues – in the case of Brailsford the cumulative effects of additional housing in Ashbourne and the expansion of the Airfield Industrial Estate – pre-pandemic Brailsford village was already experiencing a higher than average movement of HGVs on the A52.

- **Priority 8.** The purpose of comments set out as Footnotes is not fully understood However:
 - Please reflect on our comments in relation to the ambitions of the Settlement Hierarchy.
 - Also , we maintain that amenity improvement (considered to be relevant to making a planning proposal compliant) has been overlooked in the rush by the District Council to meet and secure its housing allocation in an area considered desirable by developers. Therefore, throughout, our Plan places great emphasis on the needs of the Parish which we feel have been badly represented in the past because :

District Council representatives were invited to attend all sessions and public consultations during the development of the Neighbourhood Plan. Discussions on identified amenity shortfalls were a key part of these sessions and statutory bodies and providers asked to take part.

Despite this, at no time did the Planning Authority invite the Parish Council to make specific representation in relation to **specific need** during the planning consultations and appeared to ignore our written representations: with the decision taken that the bulk of S106 expenditure would go to education, including the secondary school in Ashbourne, an expansion of the Primary School – confirmed to the Working Group by officials as more than adequate to meet the needs of the proposed development during our Plan preparation period and at the time it was built – and now proven to be incorrect if the statement from the school included in your report is to be taken into account; and for affordable houses – now in other parts of the District.

The comments of the GP Practice (new owners) are noted but we would bring to your attention that the Parish Council had to ask the District Council to obtain input from the CCG following their attendance at one session of the NP Working Group at our invitation. Some finances were secured but at the time the GP owners felt that once this investment was made the Surgery would be adequate for the anticipated village size.

7. Housing:

Para 1. We note your comments about structure. This has been the subject of consultation comments and a debate with the District Council's official responsible.

We have set out our concerns in relation to the application of Policy to Place above.

Partly because of delays caused by lack of input from the District Council, the later effects of the pandemic, and the consequent need for constant revision because of changing national and local policy, our Plan has been some years in preparation. However the core values described, which we believe represent the views of residents have been retained because of their importance to the settlements of the Neighbourhood Plan area and its rural setting

Our concerns and priorities have been stressed in all discussions with officials but have generally been ignored. While the Local Plan contains many policies which are good (and consistent with our aims) their specific application to Place has we believe been weak and inconsistent (particularly design and form, landscaping and climate change mitigations such as renewable energy).

We have therefore considered it right to re-emphasise and set out our requirements in a way we believe to be relevant to our needs and the objectives therefore of 'localism'. This point was conceded by the Official concerned at our meeting in November 2019, attended by our District Councillor, and ahead of the final submission. The comment was made that this type of structuring had now been accepted for Plans produced elsewhere. We are therefore disappointed that the Council has raised this point again.

Para 2: We do not consider these figures to be inconsistent. The first reference is to overall (from a base 1980 when the last major development took place) to 2019/20 when three large development sites are underway/completed. The 50% relates to the rapid growth since 2017 when the District Council issued its housing targets/allocations and applications followed shortly thereafter (c 152 new homes on c300 existing, including development to finance school).

Para 3. (1): Your comments on our perceived limitation on development. Please see representations above on 'the development numbers recognised to be consistent with delivering/supporting the ambitions of the Local Plan Settlement hierarchy'. Also Policies S8 and S9 of the Local Plan on the development of rural villages which we think our policy statements clearly support.

Your reference to representations made by Gladman and others, and their interpretation of Local Plan policies is of particular concern. Our purpose in preparing a Neighbourhood Plan was to:

- Accept the opportunity given to local communities to be part of making their own destiny under the Localism Act
- Match and apply District Policies adequately to reflect the needs of Place.

Please note that 2 major sites already under consideration by these developers have been ruled out by a previous SHLAA and this evidence was taken into account in our plan determination. These will be the sites considered those appropriate to the extension of the settlement boundary by developers. Alternatively our Plan acknowledges that small scale development', ideally on infill sites, and providing housing which meets local need (such as bungalows or specialist accommodation for retirement as one respondent has stated) would be acceptable.

The comment about the proportion of people wanting more housing is now redundant and it is possible that it should be removed from the document or qualified. Your advice please. It is a statistic relating to surveys conducted at the start of the development process and before any of the new development was identified or underway.

Comments in relation to retirement homes are welcome. As you see this is a policy priority for our Parish but one which has been consistently ignored in the determination of recent planning applications. In fact an application for an exceptions site (which we approved by us) was subsequently refused by the Planning Authority. Again (we believe) a reason for re-emphasising the Policy in our own Plan as a recognition of the needs of Place.

In relation to the comments on Ednaston, this should be referred back to the stated requirements for development in a Tier 5 settlement and we would contend that there are more suitable sites, depending on the nature of any development proposed

It is not the place of a Neighbourhood Plan to comment or report on national Government policy of 'levelling up', although it is generally understood that this policy is designed to target areas of high IMD and of industrial underperformance and dereliction; neither of which definition applies to Brailsford and the Derbyshire Dales in general. We would therefore ask that these comments are ruled out in any judgment of our Plan.

Para 3(2): Funding to meet amenity requirements. Again we believe this is a balance of:

- When does the existing amenity continue to meet the needs of further development and what standards are applied to this judgment. In the case of Brailsford this 'judgment' seems rather 'elastic'. Perhaps the District Council could point to some reliable references in relation to this or the policy parameters which they use, so that these could be applied to our consideration of the needs of 'Place'.
- How much notice is taken by Planners of local knowledge and reports of local incident across the statutory undertakings
- What parameters are set in relation to testing the statements of statutory bodies that existing amenity will suffice, e.g. Severn Trent Water on drainage, flood management and sewage when their own finance may be needed as match.

8. Housing – Our Policies

We are not sure what is intended/recommended in relation to the photograph. The representation recorded reflects accurately many points made to us during the many consultations on the Neighbourhood Plan. It remains a fact that the new permitted estates are a carbon copy of those to be seen as town extensions in any part of the UK and in England in particular. One developer/house builder told us that their successful business model is predicated on their ability to bring estate packages forward where volume purchase of materials is the key factor.

The Local Plan (and now the approved SPD) may set out some requirements for design and form suitable to Place but these have generally not been followed and therefore by default the builder estate package has become the 'norm'. Our focus on design if we were currently writing the Plan would now be with climate change, health and wellbeing as priorities.

- **Policy H1:** we are not sure how we should respond to the representation by Gladman:
 - Their preference is clearly related to profitability and not to local need as reflected in our consultations
 - The relationship between local amenity and development has been explored in our earlier comments. In the Plan, and in view of our experience, we are attempting to retain our preferred objective of retaining rural **village status** with suitable future development numbers applied AND ensuring that when we are over-ruled (as experience suggests we will be) that local residents receive some LOCAL benefit.
 - Small Scale Clusters - agreed that this should be more precise (likely to be 5-10) although we were advised against this, and we would consult on a proposed definition.

- **Policy H2.** Your comments noted. There are still some brownfield sites within the settlement boundary (which would be our priority) and potentially outside which could should be treated as exception sites. Comments about promoting our policies for Place have already been made. It is not clear what action is to be considered here.

- **Policy H3.** It is the local view that Derbyshire Dales Planning Policy is more restrictive in terms of proposed one site development than in regard to 'packaged' estate planning by large house building companies. Again this has been included to reflect and meet local needs with the relevant caveats.

- **Policy H4:** Again this has been included to demonstrate local priority. While we accept that it should be adequately covered by HC3 it is our experience that any deviation from the estate blueprint and numbers is not given adequate consideration and weighting by the Planning Authority and is over ruled by the pressure of meeting developer profitability. The relevant Local Plan policy could be reflected here.

- **Policy H5.** We do not agree. This Policy is a priority and key consideration of our Neighbourhood Plan and our objective to 'protect and enhance' Place. Brailsford and Ednaston are possibly unusual (in the locality) in having retained so much local historic asset. We particularly note the comments made by Gladman and their interpretation of the national policy. Their intentions are clear. The sites concerned have already been ruled out by the evidence given in preparing the current DDDC Local Plan but we expect this to be reviewed. Therefore this policy is a key piece in our aspirations to ensure that new development retains the integrity of the village environment, its rural location and its history.
- **Policy H6**

Para 1. Your comments are not fully understood. The Policy references the Design Statement which as an Annex is an integral part of the Plan? We have already commented on timings and the constant need to realign material over several years as a result of at least some avoidable delays. Our comments on specifying particular requirements for our Place (the whole purpose of the Neighbourhood Plan) have already been made throughout this response. The Design Statement could be reviewed in the light of your comments with the aim of removing it and representing this Policy?

Para 2: Unfortunately as demonstrated by earlier responses to you – one size does fit all with an estate development – those most recent in Brailsford. We are particularly concerned by Gladman's 'over prescriptive' comment. Unfortunately we read this as a 'profit reducing' concern rather than a recognition of the need to build for the future – theoretically a requirement of the latest proposal for planning change – and as written to design on a site by site basis with full regard to the mitigation of or adaptation to climate change; and human health and wellbeing. Also this comment seems to be at variance with the DDDC SPDs.

Para 3. Landscape. We note that you have not made any specific comments here. It is our assumption that these comments have all originated with Gladman. We do not accept their view – see comments earlier comments related to retaining and enhancing a Sense of Place and their own acceptance that 'one size does not fit all'. Our Plan objective is for future generations to have the same benefits as those who have gone before in relation to the choice of rural and village life. We do not believe the words to be ambiguous in any way or in conflict with para 16d of the NPPF. However we would be willing to strengthen our intentions here. if this would become a substantive point.

Para 4 - Energy Efficiency. In today's world of global interest in the subject of climate change and planet protection, and a Government policy promoting carbon neutral by 2030 we feel it is remiss of any ethical developer builder to resist this basic requirement. Also as previously reported the issue of water management and the protection of property and asset from flooding from excess surface runoff is already a major campaign within the Parish. It should NOT be necessary for such a statement to be made a priority requirement in 2021 but clearly the attitude of this developer supports the case that it must be so. Again we feel that the Planning

Authority has not taken local conditions in Brailsford (and indeed its own policies – S1) sufficiently into account when determining planning applications for the Parish putting development requirements first.

Para 5 - Parking Standards. Our comment and policy standard is based on visual evidence that the new developments in Brailsford do not include reasonable parking spaces leading to onroad parking with the consequent dangers for pedestrians, children, other vehicles and public services such as ambulances and fire engines. Car ownership in Derbyshire Dales is above the national average currently (although this may change over time with a move to more home working) and should be taken into account when they are matching design to site as they state. We would welcome your comments on how this requirement could be better evidence if this is deemed necessary.

Para 6 – Flooding. I am uncertain how the recorded comments of Severn Trent relate to our Plan aspirations and its approval. The comments do not reflect the input from local residents. This seems to reflect what they should do but our experience is different (see earlier comments). There is an ongoing dispute and investigation involving STW, the District and County Councils. STW has undertaken to do more investigatory work and to report back but this has not been completed and the delay put down to Covid-19 restrictions.

Again with the objective of protecting and enhancing Place we would wish this matter to be a priority consideration for approving any future development. Our view is that the Neighbourhood Plan should contain more requirement and evidence in relation to this matter and would welcome your advice.

We have reported in detail on each of the issues raised. We note your final paragraph. Further feedback on our comments and concerns in relation to your proposal would be helpful. We clearly do not want to delay this Plan further and are unclear at what stage substantive changes should be made; if they are made whether this opens up a whole new round of consultation; and/or if you will delay or over-rule the process if this is not done.

9. Policy Area 2 Traffic Management

Para 1: We believe that we have addressed the issue of land based policies by separating out the ‘Community Objectives’ on the advice of an external consultant. Professional advice is constantly changing and it is very difficult for the lay person to assimilate and assess. Our Community Objectives could be consolidated into an Annex as you suggest but this is a structural rather than a material change and we are unclear as to why this would make a substantive difference to the overall Plan.

Para 2: TMA2 follows guidance set out by a number of professional and campaign organisations in relation to climate change mitigation, health and wellbeing. Our concept of the Neighbourhood Plan was to bring forward and give voice to the concerns and priorities of residents (as proposed by the Localism legislation) and to set out some parameters which would be part of the assessment of site proposals – some Local Authorities have we believe included such requirements in Supplementary Planning Guidance to be taken alongside their

Local Plan: this principle now seems to form part of the DDDC consultation on an SPD for mitigation of Climate Change (2021). We accept that not all could be applied everywhere but this seems to be clear in our document.

As previously referenced, while we can see policies at District and County Highway level which should ensure our local objectives are met, we do not believe this to be the case on evidence to date. Remedial measures have had to be taken by the Highway Authority at their cost to mitigate the effects of traffic and improve safety following development in Brailsford. The main difficulty with a lack of recognition of impacts arising or unforeseen consequences from development seems to be the assessment of sites in isolation by the Planning Authority - even within the settlement boundary area.

10. Policy Area 3 – Green and Open Spaces

Para 1: We note that while the District Council feels that it has adequate safeguards in place in relation to this important policy area, we have to report that they - and these policies - failed to protect a valuable village asset – the village allotments - at a time when great emphasis is being placed on both the production of local food and access to open space for wellbeing. For accuracy the document should be updated accordingly with this loss.

Despite being a rural Parish as the document states, there has been limited public open space in the Parish (unlike the DDDC statement that Derbyshire Dales generally has a good level of provision). While this has been improved a little by the open spaces introduced in the new estates, although these are standard grassed areas (to meet the regulations) which add little to biodiversity and do not provide additional recreational facilities.

Para 2. Point noted and agreed although it is our contention that the history of the site as included shows the relevant audit trail.

- **GLS1**

Para 1. Position of Allotments noted above. However representations have already been made to the Parish Council about the site, of which the allotments were a part, being submitted as land available for development. This site borders the important conservation area.

Para 2. We would accept the Gladman amendment.

Para 3. The Local Authority comment is noted but has not been made before in any discussion. This is not a material change and we are unsure of its purpose as it would only cause further work and delay.

- **GSL2.** It is not clear what evidence DDDC are suggesting is needed. This has not been requested previously. Each element of open and recreational space was discussed and the importance rated during our regular consultations on the Plan. As a result we have been able to secure a major area at the centre of the village – the former school playing field now known as Brailsford Park.

However many of the remaining features are not truly open, e.g. golf course, and our aim would be to secure more open recreational amenity – football pitch, tennis

courts etc of greater importance with a growing and younger population. As a result of this review we acknowledge that this Policy could be cross-referenced with the objectives set out in Section 5 of our Plan, and should now also consider a replacement for the lost allotments.

- **GSL3.** We note this point but our objective is to ensure that due consideration is given to the feasibility of this in any assessment of planning proposals. We believe the policy to be consistent with the purpose of a Neighbourhood Plan.

In relation to the current specifics of these Policies, GSL 2 and 3 seem now to align well with the DDDC approved SPD on Developer contributions and should be retained in the Plan to ensure that due consideration is given to these needs in any future consideration of development plans.

11. Policy Area 4 - Local Landscape and Wildlife

Para 1: Your comments on Plans are noted. The District Council has frequently stated that it would assist here but no actual assistance has been forthcoming. To save time we would agree to remove these Plans but fear criticism that the text is insufficiently evidenced.

- Policy LW1. Your comments are noted as is the required change from ‘priority’ to ‘primary’, as you have identified. The recognition of this definition was made in relation to landscape around Ednaston (as reflected earlier in the document). Its particular local importance has been highlighted as new development has been concentrated at the western end of the village and included in the sites of interest to developers (as highlighted in the consultation comments). It is our view that any further development in this area would have significant impact on that primary landscape area.

The publication of the SPD relating to Landscape Character and Design was only in development when the NP was first in production. The additional emphasis it places on these elements when considering development is welcome – particularly the references below:

*The location and scale of this new development will need to be carefully controlled to ensure that it both protects and enhances the landscape of Derbyshire Dales.
Development should conserve what is valued, enhance the environment and encourage good design, addressing needs rather than demands.*

However, the experience of our Parish has been that these requirements have been given low weightings in the more recent planning decisions, including that made by a Planning Inspector following an appeal (Main Road Brailsford site extension). This site extension was allowed as a green field development outside the given development boundary. Therefore your comment that the Local Development Plan does not encourage additional green field development is not thought to carry much weight generally when applied to locations with considerable attraction for developers. A further such area is readily available alongside the approved Luke Lane development – now known as Acorn Meadows and the comments from the

development sector reflected in your report suggest clearly that other green field sites have been identified as of interest.

The importance of a Neighbourhood Plan and those areas highlighted is we believe a local reflection of the DDDC statement which seeks to protect and enhance landscape and environment by addressing local need.

- **Policy LW2 and 3.** The proposal to combine these 2 policies is noted and accepted as an improvement and could be related to the SPD promoting Developer Contributions which was not available at the time this Neighbourhood Plan was submitted to DDDC and no comment was made about its preparation in our final discussions with DDDC

Policy LW4. This is an important local policy and one where there is already clear physical evidence of detriment from approved development which will no doubt be reflected in any updated mapping. WE believe that it should continue to stand alone.

The intention is to protect local landscape quality and biodiversity as well as to indicate an area which can contribute to climate change mitigation. We believe this to be a simple indication of a commitment to enhancement and protection, while there has been a recent example of an approval by the District Council for a change from low level lighting (their request) to standard lighting to meet developer demands.

Although DCC has a policy of changing to LED lighting for street lighting the concentration of lighting in new development is still high resulting in increased energy demand. It is noticeable that there has been a decline in sightings of species most threatened by artificial light and reduced periods of darkness (eg bats). The DCC policy of reducing hours of operation for street lighting had little impact in terms of reducing safety or increasing crime.

12. Community Wellbeing

The comment from the Local Authority is not understood. The data contained in this section is a record of the results of surveys undertaken around the Parish and Neighbourhood Plan area.

The school is of course recognised to be a local asset and one which the Parish would wish to retain. It did not feature highly in the reports at the time as the work on the Plan began when the new school had been approved and building was underway. Therefore residents would not have reflected that it was an asset or amenity under threat.

It was always recognised by residents in public consultations (both those conducted by the Local Authorities and those which were held to consider the Neighbourhood Plan) that the design and size of the school was likely to be inadequate for the number of houses proposed by the Planning Authority. This was reflected in the all the Parish Council responses (along with those of residents) to consultations on the DDDC Local Plan and planned developments in the village. These comments were overridden at the time by the LEA and school

governors. Developer contributions for an expansion of the school were however conditioned for the Avant/Gladman site at Main Road. It is not clear whether the school is now saying it needs further funding and this will be taken into account in the rationale for further growth. However if this is the case it is a clear demonstration of the importance of local contribution in any assessment of development proposals – and especially if responsibility for planning was moved to an even more remote unitary body.

Our Plan clearly states the importance of the GP surgery to residents. During the development of the Plan several discussions were held with the GP practitioners and the PCT/CCG at the time. The view given was that the surgery was capable of accommodating the planned growth with only a modest restructuring required on the existing site.

As previously stated the intention of the Neighbourhood Plan was to set out conditions which supported moderate organic growth within the Parish or Plan area, based on the interpretation of a Tier 3 settlement and the availability of existing amenity, and the overall objective of maintaining a village environment in a rural setting with the associated quality of life.

DDDC accepts that this objective aligns with the aspiration for Derbyshire Dales as a whole and maintains that it can be met by the requirements and constraints imposed by the conditions and policies set out in the Local Plan.

However our reading of the representations made by the school and the new GP surgery owners is that development is seen as a way of enhancing/growing these individual businesses rather than as an integral part of maintaining a community. It should be noted that there has been no attempt by either party to discuss these ambitions with the Parish Council or to promote them more widely within the community.

- **Policy CW2.** Again this Policy is seen as a reflection of local requirement and need which appears to be regularly overlooked. Comments have already been made in relation to STW. However a review of the Parish Council minutes will show that surface water runoff, local flooding and sewage problems are an ongoing concern and STW are now undertaking surveying work to determine the adequacy of current capacity.

Residents reflect that regular Local flooding on the A52 (pictorial evidence available) has increased since the additional houses were added and along with apparently poor maintenance of drainage infrastructure (collapsed drains and culverts) creates a road safety hazard at several locations and causes increased expenditure on road maintenance and surfaces are damaged. It was the view of the NP Development Group that consultation on planning applications with statutory bodies is an inadequate process when several developments are planned as each application appears to be treated in isolation and therefore little account is taken of an aggregated effect.

Policy CW3. The points of a current and potential future developer are noted. We should like once again to reflect the concern that it was the belief of the Development Group that the purpose of a Neighbourhood Plan and the objective of the Localism Act was to ensure that local concerns and needs were reflected and represented in major decisions impacting a locality. We do not understand the importance of or weighting given by an independent

Examiner to the potentially subjective views of a developer (and in the case of our Plan one developer). We hope that this can be explained.

However in this case we would accept the Gladman proposal for the restructuring of our policy considerations.

In relation to the comment of the GP practice, they should first consult the local Planning Authority. The need for improved Pedestrian access from the Gladman development (Main Road Brailsford) to the village and its facilities (and in particular the Surgery) were a regular feature of the representations made by the Parish Council in the consultations on the planning application and to the local Inquiry when the appeal against refusal was held.

The Highway Authority recognised recommendations made by us and requested certain works which included footpath improvements and a new footpath in the location suggested by the Surgery. These were reduced in discussion with the developer but some, including the latter, remain. Their implementation is being disputed again by Gladman who it appears are attempting to reduce the commitment. This is the subject of ongoing correspondence between the Parish Council, our Council representatives, Highways and the Planning Authority. References can be seen in the PC Minutes.

- **Policy CW4.** This Policy has been included to:
 - Highlight support for investment in live-work space throughout the Parish (or Plan area) to prevent the extension of the village as a dormer and not a thriving and active community both socially and economically (particularly now for a post-Covid world) and enhances that set out in the Housing section.
 - To support the conversion of redundant buildings primarily for economic activity.
 - To re-emphasise the appropriateness of small-scale developments in meeting our objective of retaining a rural Parish with recognisable village settlements.

 - **Policy CW5.** The time taken by DDDC to bring this Plan to this stage must be take into account in considering this Policy. There have been developments since the original consultations took place under the championship of Digital Derbyshire. However there remain parts of the Plan area where broadband access (approaching the national policy speeds) is low or non-existent and our recent reliance on Zoom for meetings has confirmed that there remain problems even in the main settlements.

 - **Policies CW6-7.** As previously reported in this response, we were advised by an external body during the preparation of the Plan that the recording of community issues for which investment could/would be sought as part of ongoing Parish Council activity could be reflected in this way – Community Objectives – without affecting the integrity of the main function of the Plan.
- 13. Annex.** This comment is noted and agreed as per an earlier response. The requirements should form part of the Housing statement with the Annex removed. However, it is stressed that:
- Experience has shown that there has been low level adherence to/enforcement of the criteria set out in the Local Plan – this may now be aided by the SPD.

- Certain design considerations which reflect the needs of the local environment/landscape should be given prominence in a Neighbourhood Plan.

14. Appendices.

- 1. Noted and agreed although (to save time) this could have been raised previously in the last face-to-face discussions with DDDC
- 2. This comment is not fully understood and is thought to be a transmission error in relation to the full document.