



The Neighbourhood Planning (Referendums) Regulations 2012

Regulation 4 (3b) Specified Document (iii)

Brailsford Neighbourhood Plan: Summary of representations submitted to the independent Examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

SUMMARY OF REPRESENTATIONS

During the Brailsford Neighbourhood Plan Regulation 16 statutory publicity period (9th November to 21st December 2020) a total of 14 representations were received from individuals and organisations.

All responses are available in full on the Derbyshire Dales District Council website (www.derbyshiredales.gov.uk/BrailsfordNP)

A summary of the District Council's representations on the Brailsford Neighbourhood Plan were approved by the District Council's Community and Environment Committee on 16th December 2020. These can be viewed on the District Council's website: [Community and Environment Committee 16th December 2020](#)

A summary of the representations from local residents and organisations received during the statutory public consultation is set out below:

- The plan is supported, but has taken a considerable time to prepare and has been submitted after significant development has been permitted and built in the village. The largely urban design style of the estates pays little regard to the principles in the Plan. The developments do not contribute to the built character of the village. There seems to be a bleak contrast between the perhaps idealistic language of policy and planning documents and what actually happens on the ground. The village has surely now reached its absolute maximum size of development. New crossing on the 52 near Luke Lane is urgently needed.
- The core amenities of Brailsford village listed on pages 13 and 58, does not mention the village Primary School as constituting an important amenity of the village and a central part of the community. We note that as a Tier 3 settlement, Brailsford is considered to have sufficient amenity to meet the needs of significant new development. We would like to state that we regard Brailsford Primary School as a key local amenity, even though it has been omitted from this classification in the Neighbourhood plan, and that although the building is relatively new, the school buildings do not have sufficient capacity to accommodate potential increases in pupil numbers that would arise from further

development. The consideration of the school and needs for expansion should be considered within the Neighbourhood Plan.

- In respect of traffic management and encouragement of sustainable transport options, welcome the proposal to increase the number of crossing points, particularly that on Luke Lane that would allow safer passage of families to the school, but we would also appreciate consideration of infrastructure changes that would make walking and cycling to school safer, so encouraging families to consider these options.
- Promotion of a site at Ednaston for be included within the Plan for the development of 2-3 retirement homes. Housing allocations should be included within the Neighbourhood Plan, especially to meet a variety of housing needs.
- Concerns regarding highway safety in the village and poorly maintained pedestrian routes. The Plan should make more provision for highway safety improvements such as crossings (near Luke Lane and Green Lane) and speed calming measures. Another pedestrian crossing near the Green seems long over due: How are people supposed to safely walk to Doctors from Luke Lane or Cotton Yard areas of the Village?

In addition the following organisations submitted representations:

Brailsford and Hulland Medical Practice – Support for the principles within the Neighbourhood Plan. Reference to the facility having a pharmacy should be amended to reflect the provision of a dispensary on site. Whilst declaring our obvious interest, the Practice suggests that Priority 8 (p 31) might make a specific reference to our medical centre as a village service? Threats to General Practice can be varied and hard to predict, but maintaining a local practice in the Brailsford locality is an absolute priority. Reference to the medical services as a specific village service would help to confirm the ongoing support and commitment to having a practice within the village boundary. Comments made in regards to parking issues at the GP practice and suggestion that in the short to medium term, if a tarmac surface could be provided along the off road footpath which runs nearly parallel to the A52, this would improve pedestrian access to the practice for our staff and patients, with subsequent reduction in vehicles parking near or on the Green. The representation also discusses the Practices willingness to consider relocation to a purpose built facility.

Coal Authority – No specific comments

Severn Trent Water Ltd – Request that new development within Brailsford recognises the drainage hierarchy and follows as an order of preference for the management of surface water; to the ground, to a watercourse, to a surface water sewer and as a last resort to a combined sewer. Discharging surface water to a combined sewer is strongly discouraged and may result in sewer capacity issues such as hydraulic sewer flooding or spills to a local watercourse from a combined sewer overflow. Whilst the use of SUDS is a great start to managing surface water the final discharge from these features should still make every effort to avoid connection to a combined sewer. SUDS discharging to a combined sewer may still increase any existing risk of sewer capacity issues such as hydraulic sewer flooding. We are aware of the reports of flooding within the parish and whilst we suspect historic incidents are

predominantly pluvial or land drainage orientated (based on anecdotal information from local residents) we do encourage that any suspicion of sewer flooding (flow coming out of a public sewer) is reported to us so we can review the root cause. General comments and advice provided on water quality, supply ad efficiency and on surface water and sewage flooding.

Natural England – No comments

Highways England - Note that there are no significant changes within the Neighbourhood Plan from that reviewed in 2016 and that any remaining sites in Brailsford will be of such a scale that it would not be expected to result in a material impact on the Strategic Road Network and as such no further comments provided.

Historic England – Previously responded to a consultation on the plan at Regulation 14 stage and do not wish to make any additional comments.

Gladman – The preparation of the Neighbourhood Plan should be mindful of future possible revisions to the National Planning Policy Framework and changes to the Derbyshire Dales Local Plan which may arise through the Local Plan review. The representation promotes the inclusion of land at Main Road, Brailsford as a suitable and deliverable site for residential development, arguing that the site should be allocated through the Neighbourhood Plan. This site should be given due consideration in the context of Brailsford being defined as a tier 3 settlement within the adopted Derbyshire Dales Local Plan, as a village that has some services and facilities, together with local employment that means that they may be able to accommodate new sustainable growth opportunities. Given the levels of growth identified in the Local Plan it is clear that the Council considers Brailsford as a sustainable settlement capable of accommodating additional sustainable growth opportunities and the BNP should ensure it allows for flexibility to ensure sustainable development opportunities can come forward.

Support expressed for Policy H1 however the policy should be flexibly worded to allow for the most appropriate layout of housing types and sizes to respond to local needs and the characteristics of individual sites, including the provision of larger family homes. The Plan should not seek to limit the amount and scale of housing, particularly as the Parish Council wishes to improve local infrastructure and services available to residents which will not be achieved without sufficient funding from larger scale developments which can provide larger financial contributions through S106 agreements. The term ‘small scale clusters’ is not defined in the policy and greater support should be provided for developments that assist with the needs of the elderly and people with disabilities.

Objection to Policy H2 which only allows for development within a narrow set of circumstances such as infill development, development on brownfield sites within the settlement boundary and the conversion of existing buildings to residential use to meet local housing needs. Policy H2 is not appropriate as it takes a more restrictive approach to development than that required by the Framework and the adopted Development Plan. Sustainable development proposals adjacent to the settlement boundary that are proportionate in size to Brailsford’s role as a settlement within the

District should be supported and wording should be included in the policy to reflect this.

Objection to policy H6 which goes beyond the provisions of National Planning Policy and Guidance in respect of protecting the historic environment and the significance of heritage assets. Further concerns expressed regarding the 'design' elements of Policy H6 being overly prescriptive and providing little flexibility for developments to respond to site specifics.

In respect of policy TMA1 comment that the Parish Council will need to embrace larger scale development to secure the infrastructure investment outlined within the Neighbourhood Plan and in relation to policy CW3 such contributions should only be sought where they are necessary to making a development acceptable in planning terms.

Support for the principles of Policy GLS2 to increase the supply of public open space.

Planning Design Practice – revisions to the settlement framework boundary shown on Plan 5 should be amended to include land with planning permission (75 dwellings at land north of the A52 under 18/00397/REM.) The Neighbourhood Plan should consider broadening the Settlement Framework Boundary to allow further development to take place. The parish council should pause the Neighbourhood Plan process and undertake a call for sites based on the expected increase in housing numbers in the District and Brailsford's share of that increase. The Plan should allocate sites for development.

Plan 7 denotes Brailsford Allotments, off the A52, as a Local Green Space, the allotments no longer exist and have been incorporated into a farming operation. The land forms part of a larger field and it is inappropriate to include the former allotment land as a Local Green Space. Policy GSL1 should be altered to omit any reference to allotments unless the Parish can secure a new allotment site elsewhere.

Objection to policy CW2, development should not be limited based on the capacity of the medical practice and the issues pertaining to sewage capacity and infrastructure are not planning matters in the context they are written in the policy and should be referred to and addressed directly with the infrastructure provider.

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