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Ask for: David M Dale

Planning Policy

Dear Madam/Sir

Localism Act 2011 – Strategic Planning Comments

Breadsall Neighbourhood Plan 2019 - 2029:

Submission Draft

Thank you for consulting Derbyshire County Council (DCC) on the Breadsall Neighbourhood Plan: Submission Draft (BNPSD). The comments below are DCC's Member and Officers' technical comments with regard to the education, landscapes and green spaces, Green Belt, sustainable energy, transport, housing, and flood risk aspects of the Plan.

Local Member Comments

Councillor Carol Hart, the Local County Council Member for Breadsall and West Hallam, has been consulted. To date, no comments have been received, but if I receive any I will forward them to you.

Officer Comments

General

Following its representations on the Pre-Submission version of the Plan pointing out the omission of policies on Low Emission Vehicle Infrastructure and Dark Skies, DCC welcomes the inclusion of policies DS 1: Dark skies, and EN 2: Low-emission transport (but see a further comment on that below) in this version of the Plan.

6 Breadsall parish overview

6.2 Breadsall parish today

Breadsall Church of England Primary School

The sentence should be updated to say:'111 pupils on roll in the 2019/2020 academic year
.....

9.2 Key landscapes and vistas

9.3 Local Green Spaces

Policies LV 1: Key landscapes and vistas, and GS 1: Landscapes and Local Green Spaces, seek to protect key views and green spaces, listing these in a table. However, they do not seek to encourage developments outside those areas from having an impact or contributing positively to an improvement in landscape quality.

DCC would suggest that the publication 'The Landscape Character of Derbyshire' <https://www.derbyshire.gov.uk/environment/conservation/landscapecharacter/landscape-character.aspx> should be used/referenced in order to identify the various landscape characteristics that should be encouraged in design and boundary treatments of developments. This would help to conserve and enhance the parish landscape and setting.

9.4 Green Belt

DCC reiterates the comments it made on the Pre-Submission Version of the Plan relating to Green Belt, in welcoming the inclusion of a specific section in the Plan on Green Belt and highlighting the importance of the role that the Green Belt plays in covering much of the parish by preventing the coalescence of the settlement with the urban area of Derby to the south. Section 9.4 sets out a reasoned justification why a specific policy on Green Belt is not required in the Plan as a policy is already included in the Erewash Borough Core Strategy and DCC accepts this as a reasonable position. However, DCC would reiterate the concerns it raised on the Pre-Submission Version about the inclusion of a 'Proposal' under GB A: Green Belt, as this would be difficult to apply and implement in practice, not least because it would be unclear as to what weight, if any, could be applied to the approach as set out in this format.

10 Sustainable energy

In response to its comments on the Pre-Submission version of the Plan, DCC welcomes the inclusion of this section on sustainable energy and climate change. In addition to the

issue of climate change, the section recognises the need for renewable energy as a contribution to mitigation, and calls for new developments to include high levels of energy efficiency.

Policy EN 1: Energy

However, Policy 'EN 1: Energy', does not include the above requirements, nor does it require new buildings to incorporate low carbon/renewable energy infrastructure. These issues are touched upon in Policy HD 4: Design, '7 using innovative design that is sustainable in its design, construction and operation' but this wording is open to interpretation and should be more descriptive, stating specifically that high energy efficiency is required and that new buildings should include, where appropriate, renewable energy generation capacity. DCC welcomes the inclusion of 'sustainable drainage' under '10' in policy HD 4.

Policy EN 2: Low-emission transport

Walking and cycling are also classified as 'low emission transport', and DCC would suggest that these modes of travel should be recognised and added to the policy.

DCC would suggest the addition of the word 'appropriate' to the second part of the policy: New residential development shall either provide off-road charging facilities for ultra-low-emission vehicles or incorporate appropriate electrical infrastructure to enable the future addition of such facilities.

DCC would suggest the provision of proper cycle storage within commercial and residential developments as identified in the Cambridge City Council's guidelines: <https://www.cambridge.gov.uk/media/6771/cycle-parking-guide-for-new-residential-developments.pdf>

In addition, DCC would suggest that all new development (both residential and commercial) should provide safe pedestrian and cycle connectivity that links into existing infrastructure, including pedestrian walkways and cycle routes, as appropriate.

11 Transport and road safety

DCC would reiterate the comment in its response to the Pre-Submission version of the Plan that consideration should be given to active travel measures, accessing either the local cycle network or the key cycle network, again wherever this is appropriate. Links to both would potentially ease current or future concerns with regard to road traffic by offering alternatives to the car.

11.1 Road safety and parking

Policy T & RS 1: Parking standards and vehicle charging

'6. All non-domestic development shall accommodate all visitor and employee parking on site, including school drop-off traffic'.

Evidence shows that at present approximately 55% of pupils in Derbyshire are taken to school by car. Consequently, for every 100 pupils, this policy would imply that 55 car park spaces should be provided for the morning and afternoon school 'run'. Such a facility would remain unused at other times.

The phenomenon of ‘induced demand’ is a recognised one, especially in relation to the provision of car-based infrastructure. Put simply, the more that is provided, the more car-based journeys will occur. Where ‘drop off’ facilities have been provided at other schools in Derbyshire, these have become management and organisational headaches for the schools concerned.

A more appropriate policy would be to ensure that the school should be designed with sustainable travel in mind, i.e. the layout and design should facilitate safe and simple pedestrian and cycle access to neighbouring residential areas, thus making these modes the simplest option. This would be in addition to the provision of cycle / scooter storage for pupils, and cycle storage and changing facilities for staff. The school should also engage with the Modeshift STARS <https://www.modeshiftstars.org> process to achieve Silver accreditation. For details and support with Modeshift STARS, contact: sustainable.travel@derbyshire.gov.uk

Consequently DCC would suggest that the phrase, ‘including school drop-off traffic’ should be removed from the policy.

11.2 Public transport

Proposal PT A: Public transport

‘The Parish Council will monitor the effectiveness of bus services and will lobby Derbyshire County Council and the bus operators when changes to routes or timetables are considered necessary’.

Given the nature of Breadsall and the rate of car ownership, the current economics of public transport are likely to remain for the foreseeable future. Consequently, DCC would suggest that the proposal should be amended to read:

‘The Parish Council will work with public transport operator(s) and Derbyshire County Council to continue to provide a viable bus service for residents of Breadsall’.

Where development occurs, developer contributions should be sought to improve the public transport offer. This could include the support for any or all of the following options: Community Transport, Derbyshire Connect or similar bus services, Community Car Club, Car share and Wheels to Work.

12 Housing and design

12.1 Provision and distribution

It is welcomed that DCC’s comments on the Pre-Submission Version of the Plan have been addressed in respect of the need for clarification in this section and Policy HD1 of the basis for the definition of the village housing development envelope defined in Figure 15. It is also welcomed that DCC’s comments on criterion 4 of Policy HD1 have been addressed in respect of clarification of the restriction on the number of dwellings that would be acceptable in the village envelope to no more than ‘10 per site’ rather than 10 for the whole of the village envelope as set out in the previous iteration of the policy, which was considered to be contrary to the principles of the National Planning Policy Framework (NPPF).

Other Issues

DCC has no comment to make on the Development Control or Flood Risk aspects of the Plan.

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

Yours faithfully

David M Dale

David M Dale
Policy and Monitoring and LA lead: CLIP: Planning Sub-group

Environment Agency

Erewash Borough Council
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Our ref: LT/2011/113659/OR-
05/IS1-L01
Your ref:

Date: 05 May 2020

Dear Sir / Madam

Breadsall Pre-submission Draft Neighbourhood Plan

Thank you for consulting the Environment Agency on the Breadsall Draft Neighbourhood Plan.

Policy NP/HD 1: Housing infill

Whilst there are no site allocations proposed within this neighbourhood plan, Policy NP/HD 1 gives some requirements for any housing infill within the Breadsall NHP area. Given the requirements of **Policy NP/FR 1: Reducing Flood Risk**, it may be beneficial to add a bullet point within this section highlighting that any infill development will also need to adhere with the requirements of **Policy NP/FR 1: Reducing Flood Risk**.

Policy NP/FR 1: Reducing Flood Risk

We welcome that no development is to be allowed within the flood zones area unless it can be shown that it does not increase the flood risk.

We note that this policy gives specific requirements for development within areas of flood risk. It is noted that the policy is mainly aimed at surface water flooding not being increased. If development is proposed in flood zones 2 and 3 it should be in line with the requirements of the National Planning Policy Framework (NPPF). It would also be beneficial to include a caveat to the flood zones shown in Figure 19 as these could be updated throughout the lifetime of the

neighbourhood plan.

Policy NP/B & NC 1: Biodiversity

We welcome the inclusion of this policy to ensure net gain is incorporated within new developments within the parish neighbourhood plan area.

Yours sincerely

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Erewash Borough Council

Breadsall Neighbourhood Plan 2019 – Final Draft

Formal Consultation Comments from Erewash Borough Council

A) Overview

Breadsall Neighbourhood Plan is the result of a significant amount of work by the Breadsall Neighbourhood Plan Advisory Group and Breadsall Parish Council, and has been subject to extensive engagement with the wider community of Breadsall. Professional input has also been provided by the Parish Council's own neighbourhood planning consultant, and the independent advice of a neighbourhood planning consultancy procured by the Borough Council to satisfy the requirements of the duty to support neighbourhood planning set out in Section 3 of Schedule 4B of the Town and Country Planning Act 1990.

Notwithstanding the advice available to them, Breadsall Neighbourhood Plan Advisory Group have held true to their clear vision for Breadsall, which is as a place to be protected. Of the 15 stated aims, 12 are concerned with how development can be restricted, with only the remaining three (Aims 3, 4 & 6) supporting development and only one (Aim 4) offering a vision of how development could benefit the Parish.

It is not immediately clear how this approach is based on the purposes of the planning system as set out in Chapter 2 of the National Planning Policy Framework (NPPF), and in particular how they sit with the overriding presumption in favour of sustainable development set out there. It may well be that the Breadsall Neighbourhood Plan Advisory Group have considered that the development needs of the Parish are small, and therefore not in need of much promotion. However, it is equally valid to say that the development opportunities in Breadsall are also small, and that consequently the development needs of the Parish do need promotion in order to be achieved.

In these comments the Local Planning Authority has attempted to identify how Breadsall Neighbourhood Plan can achieve general conformity with the NPPF. However, it is not the place of the Borough Council to set out Breadsall's own vision, and therefore, in so far as that vision may fall short of general conformity with the NPPF, the Borough Council does not consider that it can amend the Neighbourhood Plan to meet the Basic Conditions.

B) Need and Opportunities for Development

Section 12.1 prays in aid Core Strategy Policy 2, which proposes that only 300 homes are required in the rural areas of the Borough over 2011-2028. The Neighbourhood Plan goes on to consider that the Parish has already made a sufficient contribution to this total. Unfortunately, that text overlooks the fact that the Erewash Core Strategy was adopted in March 2014, and consequently in accordance with regulation 10A of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended) has been due for review since March 2019. Furthermore, the Borough is currently failing to meet the Government's Housing Delivery Test and does not have a 5 year land supply. As a consequence, the strategic housing policies of the Core Strategy can no longer be relied upon in respect to housing delivery and the Government's standard housing need methodology should be applied instead. These points are all acknowledged in the Borough Council's Options for Growth consultation that was launched in Jan 2020.

The standard methodology sets the housing development needs of the Borough at 393 dwellings per year. As Breadsall Parish forms 0.69% of the Borough (2011 Census populations of 773 out of 112,081), that equates to a housing need of 2.7 dwellings per year, which is 27 homes over the 2019-2029 period of the Plan.

Though a few dwellings may come forward over the plan period in the Green Belt as agricultural workers dwellings or barn conversions, the majority of supply would most likely have to be provided within the settlement boundary of Breadsall Village, through infill, subdivision and redevelopment. All of those routes will result in an increase in density, and consequently policies that aim to prevent an increase in density in the village may militate against the necessary delivery of new homes. Policies TR & RS 1, HD 1 and HD 3 all attempt to do just this, and therefore may run contrary to the presumption in favour of sustainable development. It is also notable that Aim 4 of the plan seeks a significant portion of new development to be smaller dwellings, which by definition will require smaller plot sizes and therefore increase density. Policies TR & RS 1, HD 1 and HD 3 may therefore also be contrary to the aims of the Neighbourhood Plan.

Aim 6 of the Plan is to support small-scale employment opportunities. Chapter 13 discusses employment, and concludes that the parish is not suitable for large scale employment development, but that limited forms of sustainable economic growth that are appropriate to the area will be supported. However, the following Policy E1 only encourages limited development at existing businesses, with no support being offered to new businesses. Policy E1 further rules out any form of B2 or B8 business. There are no measures to support the leisure industry despite that forming the majority of employment in the Parish as identified in Chapter 13, no measures to address the limited range of services in Breadsall Village, and no consideration of the balance between employment type and the housing stock available.

Other policies of the Neighbourhood Plan have the potential to prevent any type of change through the preservation of vistas (C1 and LV1), habitat (NC1) and dark skies (DS1). Taken together and on balance, it is difficult to conclude that the Neighbourhood Plan is in general conformity with the presumption in favour of sustainable development set out in the NPPF.

C) Detailed Policy Issues

Policy C1: Development proposals in the conservation area

Criteria 1b requires development to “sustain existing vistas”. This could be interpreted as saying that the appearance of the conservation area should not change, which is not in general conformity with heritage policy in Chapter 16 of the NPPF, which requires the relative harm to a heritage asset to be weighed against other factors.

Policy C1 criteria 1b should be deleted.

Criteria 1c requires applications to be accompanied by an assessment of the impact of proposals on the vistas identified in criteria 1b. As indicated above, the policy of “sustaining existing vistas” is problematic in its own right. In addition, the policy would have the effect of introducing an additional validation criteria over and above the Local Planning Authority’s current requirements. Requiring additional supporting information that is not relevant, necessary or material would be contrary to NPPF paragraph 44.

Policy C1 criteria 1c should be deleted.

Criteria 2b requires relevant building to plot ratios to be respected. As the Breadsall Conservation area is mostly divided into existing plots, this could be interpreted as saying that no additional development should occur, which would not be in general conformity with heritage policy in Chapter 16 of the NPPF.

Policy C1 criteria 2b should be deleted.

Criteria 3 requires green space to be protected from development that would have an adverse impact on the special character of the (conservation) area. This does not appear to be in general conformity with heritage policy in Chapter 16 of the NPPF, which requires the relative harm to a heritage asset to be weighed against other factors.

Policy C1 criteria 3 should be deleted.

Policy LV1 Key Landscapes and Vistas

Though it is appreciated that the vistas photographed in Appendix C are attractive, the 23 different viewpoints identified command wide views over indeterminate parts of the Parish such that it would be difficult to apply Policy LV1 without individually checking each application against each of the 23 viewpoints. This may not be practical, and as a consequence the policy may not be capable of being implemented.

Policy LV1 should be deleted.

Proposal GB A: Green Belt

Though the Local Planning Authority notes the strong local support for retention of the Green Belt boundary, it does not appear appropriate for policies of the Neighbourhood Plan to seek to control future reviews of the Local Plan

Policy GB A should be deleted.

Policy B & NC1 Biodiversity

Section 9.5 appears to have been written separately from section 9.3, with the effect that both sections claim to designate overlapping areas of Local Green Space. Section 9.3 is more effective at this, as section 9.5 does not adequately depict most of the areas it refers to, or to allocate them in the form of a policy. However, the Neighbourhood Plan as written lacks sufficient clarity, which could most easily be restored by selective deletions.

Section 9.5: The text of sites 1 through 10 and figure 12 should be deleted.

NPPF paragraph 170 requires planning decisions to enhance the local environment by, amongst other things, minimising impacts on and providing net gains for biodiversity, and the Environment Bill announced in the last 2019 Queens Speech intends to put this requirement into law. Nevertheless, there are a number of practical issues which have to be taken into account.

Policy B & NC1 applies to all planning applications. That would include proposals that have no impact on biodiversity e.g. changes of use, applications for vehicle crossings etc. It would also include all domestic extensions, for whom the requirements, even if revised as advised below, could prove unduly onerous.

It would be more practical to apply the requirements to developments of one house or more, and to new commercial floorspace.

Policy B & NC1: add “major and minor” after “all”.

Criteria 1a requires the conservation of existing biodiversity to the maximum possible extent. That could be interpreted as not supporting the developing on any greenspace, which itself would not be in general conformity with the NPPF. It is suggested that biodiversity should be maintained where practical instead.

Policy B & NC1 criteria 1a: replace “to the maximum extent possible” with “where practical”.

Criteria 1a also seeks to prevent hedgerow netting. As planning permission is not required to do this, the policy can have no effect.

Policy B & NC1 criteria 1a; delete “Wildlife deflecting measures such as the use of hedgerow netting to discourage nesting birds will not be permitted.”

Criteria 1b seeks to require any loss in biodiversity from development to be compensated for by enhancement on other nearby land. However, for minor and other development where there is no scope to use s106 agreements in accordance with the NPPF, there is no planning mechanism to secure such improvements.

The policy could only be implemented in respect to major development, where the s106 mechanism is available. Even then, the onus would be on the Local Planning Authority to identify the opportunity for biodiversity enhancement, and not on the developer. Though the Neighbourhood Plan provides generic advice about biodiversity enhancement, it does not contain any proposals on identified parcels of land that a developer could contribute to. Consequently, as no means to deliver the policy have been provided, it does not appear appropriate.

Policy B & NC1 criteria 1b should be deleted.

Criteria 2 aims to protect priority habitats and species as identified in the Lowland Derbyshire Biodiversity Action Plan. However, nowhere in the Neighbourhood Plan are those priority habitats or species, or their locations, identified. Consequently the policy as worded is imprecise and so unlikely to be effective.

Policy B & NC1 criteria 2 should be deleted.

Criteria 3 attempts to control the felling of trees not protected by Tree Preservation Orders or by location within the Conservation Area. Such felling does not require consent, and as such the policy can have no effect.

Policy B & NC1 criteria 3 should be deleted.

Criteria 4 requires the use of native species in all landscaping where possible.

To restrict all landscaping, including in domestic gardens, to native species only appears unreasonable and ignores the significant wildlife benefits of many non-native species e.g. evergreen laurels for nesting birds, the buddleia bush for butterflies etc. the criteria should be changed to "where appropriate".

Policy B & NC1 criteria 4: delete "all", change "possible" to "appropriate".

Criteria 6 aims to protect hedgerows. In most cases hedgerows do not require consent to be removed, and even where Hedgerow Consent is required consideration is limited to a narrow range of criteria. Planning policy has no control over the exercise of agriculture, intensive or otherwise.

Policy B & NC1 criteria 6 should be deleted.

Policy DS1 Dark skies

The policy seeks to resist lighting in all areas of the Parish that are currently dark at night. Though the intention of helping to preserve dark skies is supported, the effect is quite extreme and has little regard to the need for domestic or commercial security. It also risks being unduly prejudicial to new development, which would inevitably introduce lighting into previously dark areas.

Policy DS1: second sentence should be deleted.

Policy EN1 Energy

The policy as worded conflicts with NPPF paragraph 151 by not providing a positive strategy for renewable energy. This might be rectified by removing the restrictive criteria.

Policy EN1: retain first sentence only.

Policy EN2 Low Emission Transport

It does not appear reasonable to require community and commercial development to provide charging facilities, either for private or public use. Provision could be encouraged instead. As not all residential development will have off-road parking, it is not possible to require all residential development to have off-road charging facilities. Provision here should only be where appropriate.

Policy EN2 first sentence, insert "be encouraged to provide" after "shall".

Policy EN2 second sentence, add "where appropriate" to end.

Policy TR & RS1 Parking Standards and Vehicle Charging

By title this policy overlaps with Policy EN2, though in practice it is silent on vehicle charging. Vehicle charging could be removed from the title to avoid confusion.

The policy is driven by the views of residents that on-street parking in Breadsall impedes the flow of traffic and obstructs pavements for pedestrians. However, the former point appears to be contradicted by concerns about rat-running and speeding traffic raised in previous paragraphs. It seems likely that rat-running and speeding traffic would be worse if there were less on-street parking to slow it down and discourage it. This point also appears to overlook the fact that on-street parking is entirely legal, and where it is dangerous it can be controlled by the Highway Authority through traffic regulation orders, or indeed by the police if an obstruction is

being caused. It is not considered that the planning system should be used to make good perceived shortcomings in the discharge of the duties of those authorities.

In light of the above discussion, the policy proposed to prevent more on-street parking appears unduly restrictive. The level of parking required, at one or more space per bedroom, appears excessive and would result in an inefficient use of land contrary to NPPF paragraphs 122 and 123. The proposal to apply the same standards to the extension of existing dwellings, many of which may not meet the proposed standards even before extension, may also be unreasonable, as may the requirement for commercial and school development to accommodate all parking requirements off-street, whatever that level of provision may be. In addition the policy as proposed could effectively preclude most of the limited development opportunities available to Breadsall. This would not be in general conformity with the NPPF.

Policy TR & RS1 should be deleted.

Policy HD1 Housing Development

The introductory text supports small scale infill, windfall and redevelopment, but makes no mention of conversion or sub-division. Given the need to deliver development outside the Green Belt (and therefore inside the village) and the aim of the plan to deliver more small homes, these appear significant omissions.

Policy HD1: add “and from the conversion and subdivision of existing buildings” after “sites”.

Criteria 1 allows development that infills small gaps in the built up frontage that are closely surrounded by buildings, but by omission does not support development in larger gaps, on sites not in the built up frontage, and on sites not surrounded by development. Furthermore, despite the initial text of the plan supporting windfall and redevelopment sites, neither Criteria 1 nor any other criteria appear to do so. Were these other opportunities suitably supported by their own criteria, it might be possible to amend Criteria 1. In their absence, it is difficult to support its retention.

Policy HD1 criteria 1 should be deleted.

Criteria 2 appears to duplicate the controls of Saved Local Plan Policy H3. As such it is unnecessary.

Policy HD1 criteria 2 should be deleted.

Criteria 3 rules out development on backland plots. Given the limited opportunities for development in Breadsall Village, such a restriction ought to require significant justification, but little is provided. The criteria also seeks to prevent a reduction in privacy. In practice, development within the village envelope will nearly always result in some reduction in privacy. A more useful test is may be not to reduce privacy unreasonably.

Policy HD1 criteria 3: delete “”backland or” and insert “unreasonably” before “reduces”.

Criteria 4 seeks to place a limit of 10 housing units on any development.

No justification for this threshold is offered, making it appear arbitrary.

Policy HD1 criteria 4 should be deleted.

Criteria 5 & 6 cross reference the controls of separate policies.

Such cross-referencing is unnecessary.

Policy HD1 criteria 5 & 6 should be deleted.

The final text seeks to prevent any development that does not confirm to Policy HD1. This would not be an appropriate approach to non-housing development and in any case gives

Policy HD1 undue prominence, as applications should be assessed against the criteria of the whole development plan and not just one particular policy.

Policy HD1: delete “Only development that meets these criteria shall be permitted.”

Policy HD2 New Housing Mix

The aims of this policy are supported, as it seeks to provide the type of housing needed in the Parish. However, it is undermined by its construction and lack of underpinning evidence. The attempt to make a policy for a mix of housing binding on all development, including single plots, is a practical impossibility.

Policy HD2: delete “all” from first sentence.

Criteria 1 seeks a mixture of housing types and sizes to meet identified local needs. However, as the Neighbourhood Plan does not identify what those needs are, the policy can not be implemented.

Policy HD1 Criteria 1 should be deleted.

Policy HD3 Housing Density

By seeking to ensure the density, footprint, separation, scale and bulk of all development is similar to its neighbours, this policy could effectively exclude the possibility of development in Breadsall Village, and so would not be in general conformity with the NPPF.

Policy HD3 should be deleted.

Policy HD4 Design

The policy purports to apply to all development, but will be inapplicable to many.

Policy HD4; replace “All” with “Relevant”.

Criteria 1 cross references Policy HD3. Cross referencing is unnecessary, and Policy HD3 is considered inappropriate in any case. The specific wording of Criteria 1, requiring new development to comply with established density and plot widths, could effectively exclude the possibility of development in Breadsall Village, and so may not be in general conformity with the NPPF.

Policy HD4 Criteria 1 should be deleted.

Criteria 8, 9 & 11 cross-reference to other policies of the Neighbourhood Plan. This is not necessary.

Policy HD4 criteria 8, 9 & 11 should be deleted.

Policy HD5 Contributions to new infrastructure and facilities

Policy HD5 requires financial contributions towards Parish Council priorities that are to be determined on a case by case basis by consultation with the Parish Council.

A policy seeking financial contributions towards unspecified projects appears to be contrary to the legal requirements of regulation 122 of the Community Infrastructure Regulations 2010 for contributions to be necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

Policy HD5 should be deleted.

Policy E1 Economy

Criteria 1 is actually the main policy, and so does not need to be numbered.

Policy E1 criteria 1 should not be numbered. The remaining criteria should be renumbered.

Criteria 2 supports the opening of a new café or tearoom. However, as this has been achieved through conversion of the village shop, the criteria is no longer necessary.

Policy E1 criteria 2 should be deleted.

Criteria 3 restricts employment use to within the village boundary, an existing employment site on the edge of the Parish, and farm diversification. This would preclude the commercial use of redundant buildings in the countryside or change of use of land to open space commercial uses, which could be contrary to Green Belt policy in the NPPF.

Policy E1 criteria 3 should be deleted.

Criteria 4 limits business uses to those in use class B1 only, except for one existing employment site. This blanket exclusion of all B2 and B8 uses would apply from ale brewing to yeast storage and a great deal in between. Traditional village crafts like blacksmiths would be banned, along with less prosaic but relevant uses such as car repairs and click and collect points. Rural enterprise would also be stymied, with most food manufacture prevented. It is difficult to see how this restriction is in general conformity with Chapter 6 of the NPPF.

Policy E1 criteria 4 should be deleted.

Criteria 5 welcomes farm diversification schemes, but not where they create noise or traffic that is considered to harm rural character. It is noted that agriculture, which by definition is rural in character, has significant noise and traffic impacts and that rural locations can provide the best locations for noisy operations and those involving heavy goods vehicles and plant due to their distance from residential neighbours.

In that context criteria 5 may not be appropriate.

Policy E1 criteria 5: delete “and are subject to controls preventing adverse physical effects such as excessive noise and traffic generation which may harm the rural character of the Green Belt.”

Criteria 6 supports working from home, except, among other things, where it would harm the rural character of the Green Belt. It is unclear how working from home could cause such harm, and therefore why this criterion is necessary.

Policy E1 criteria 6: delete “or harm the rural character of the Green Belt”.

Criteria 7 requires all new development to be served by 100 Mbps broadband. This can only be achieved by FTTP (connecting the optical fibre network to the premises). Breadsall Village currently has FTTC (fibre connections to the cabinet), but BT Openreach have no current plans to upgrade the Village to FTTP. Consequently the criteria may be unreasonable.

Policy E1 criteria 7 should be deleted.

Criteria 8 cross references to other policies of the Neighbourhood Plan, which is not necessary.

Policy E1 criteria 8 should be deleted.

Policy CF1 Development proposals affecting community facilities

Policy CF1 aims to protect community facilities from loss or impairment. The former is understood, but the latter is imprecise, and therefore may be inappropriate.

Policy CF1: delete “or significant impairment”

Policy CF1 also intends to protect both specific identified and “similar” facilities. That approach is imprecise and therefore may be inappropriate.

Policy CF1: delete “or any similar facilities”

Policy FR1 Reducing Flood Risk

Flooding is known to be a major concern of Breadsall Parish, and with good reason due to the level of flood risk as defined by the Environment Agency. However, it is noted that the text of Chapter 15 and Policy FR1 have not been supported by any additional evidence. This is a missed opportunity, as an appropriate Flood Risk Assessment could have identified practical measures to alleviate flood risk. As it stands, the causes of flood risk identified in the supporting text, though intuitive, are unproven and do not form sufficient grounds to impose additional requirements on development.

Criteria 1 aims to prevent any new development in the area defined by the Environment Agency as having a high surface run-off flood risk. The mapping provided is not precise enough to apply in practice, and so the policy cannot be implemented. In any case, national policy does not simply prevent development in areas of high flood risk, but instead applies a complex range of tools including the sequential test, flood risk compatibility matrix, and exception test. None of this appears to have been taken into account in drafting the policy.

Policy FR1 criteria 1 should be deleted.

Criteria 2 puts the onus on developers in the medium surface water run-off risk area to demonstrate that they will not impact on drainage infrastructure or contribute to surface run-off. As suggested for Criteria 1 above, Criteria 2 is also supported by imprecise mapping and does not take into consideration national flooding policy controls. It also appears to contravene the Water Industry Act 1991, which gives all new development the right to connect to the public sewer network. Finally, the approach taken does not appear to take into account the requirements of the Building Act 1984, which makes the control of drainage from new development a building control matter, not a planning one.

Policy FR1 criteria 2 should be deleted.

Criteria 3 requires all new development to have drainage infrastructure that does not increase flood risk. As suggested for Criteria 2 above, this appears to be subject to other legislation, in which case it would be unreasonable to attempt to put additional controls in place through the planning system.

Policy FR1 criteria 3 should be deleted.

Criteria 4 requires all new development to be served by sustainable drainage infrastructure. The NPPF already requires all major development and development in flood risk areas to be served by sustainable drainage systems unless there is clear evidence that this would be inappropriate. Despite the history of flooding, no evidence has been provided to justify a more stringent regime in Breadsall.

Criteria 4 should be deleted.

Highways England



Our ref:
Your ref:

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Direct Line: 0300 470 4457

Via Email: planningpolicy@erewash.gov.uk

19 May 2020

Dear Sir/Madam,

Consultation on the Breadsall Neighbourhood Plan

Highways England welcomes the opportunity to comment on the Breadsall Neighbourhood Plan which covers the period of 2019 to 2029. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.

Highways England has been appointed by the Secretary of State for Transport as the strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Breadsall Neighbourhood Plan, our principal interest is in safeguarding the A38 which routes through the westernmost part of the Plan area.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and borough-wide planning policies. Accordingly, the Neighbourhood Plan for Breadsall is required to be in conformity with the Erewash Local Plan, and this is acknowledged within the document.

We note that the Erewash Local Plan focuses on developing existing urban areas in the borough, therefore, a housing allocation has not been identified within the Breadsall Neighbourhood Plan.

Neighbourhood Plan Policy HD1 will support small residential developments on infill, windfall and redevelopment sites subject to them meeting relevant requirements such as not involving outward extension of the village.

Considering the limited level of growth proposed across the Neighbourhood Plan area we do not expect that there will be any material impact on the operation of the SRN.

We have no further comments to provide and trust the above is useful in the progression of the Breadsall Neighbourhood Plan.

Yours sincerely,

S Freek

Steve Freek
Midlands Operations Directorate
Email: Steve.Freek@highwaysengland.co.uk

Historic England

Dear Planning Policy

Thank you for your consultation e-mail below. We sent a response to the Regulation 14 consultation on 10 December 2018 and do not have any further comments to add to the Regulation 16 consultation.

Yours sincerely

Victoria Walker on behalf of **Clive Fletcher**

Principal Adviser – Historic Places (Midlands)

Regions Group

Historic England

Dear Sir / Madam

Breadsall Neighbourhood Plan Regulation 16 Consultation

April – May 2020

Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young Central
Square South Orchard
Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid National Grid
House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect

of this letter, then please contact us.

Yours faithfully



Matt Verlander MRTPI Director

0191 269 0094 matt.verlander@avisonyoung.com For and on behalf of Avison Young

Natural England

Date: 17 April 2020
Our ref: 314263



Erewash Borough Council
planningpolicy@erewash.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

Breadsall Neighbourhood Plan - Regulation 16 consultation

Thank you for your consultation on the above dated 09 April 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact:
consultations@naturalengland.org.uk.

Yours faithfully

Alice Watson

Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NP_PF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of

particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiv>

[ersity/protectandmanage/habsandspeciesimportance.aspx](http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx)

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiv>

[ersity/protectandmanage/habsandspeciesimportance.aspx](http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx)

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your

community.

- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Nottinghamshire County Council

Good afternoon,

Thank you for consulting the NCC policy team on the Reg 16 consultation for the Beardsall Neighbourhood Plan. I can advise that at this time, the County Council does not have any strategic policy comments to make.

Many thanks,

Emma Brook

Planning Policy Team

Place Department

Nottinghamshire County Council

County Hall

Nottingham

NG2 7QP

Severn Trent

Dear Sir/Madam

Breadsall Neighborhood Development Plan 2020

Thank you for the opportunity to comment on your consultation, we have summarised our response within this document for your viewing. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

Policy HD1: Housing

We acknowledge there are currently no major strategic sites proposed within the parish and that new housing development should be limited to infill and small windfall sites.

We appreciate the conscious linkage from this policy pointing towards the consideration of flood risk and that specific policy FR1.

Policy GB A: Green Belt

We recognise the Parish's comments around development restraint specifically in relation to urban sprawling and maintaining the green belt buffer zone between Breadsall and Derby.

One of the larger potential development sites we are aware of within the parish originates from the SHLAA; Land to the North of Croft Lane, however as this is within the Green Belt Buffer zone we understand it is unlikely to come forward for development without first a formal green belt review.

Policy FR 1: Reducing flood risk

We are supportive of this policy however we feel it could be enhanced by specifically mentioning the importance of new development adhering to a drainage hierarchy with regards to surface water management. Whilst the policy does push the use of Sustainable Urban Drainage Systems and points towards the governments Surface Water Management Plan Technical Guidance we feel this policy could go further in pushing the drainage hierarchy whereby surface water should be disposed of in the following order of preference;

1. To soil/ground via infiltration
2. To a nearby watercourse or ditch-course
3. To a designated public surface water sewerage system
4. To the public combined sewerage system (strongly discouraged)

A discharge into the combined sewerage system (or foul) will often require some form of infrastructure upgrade so that hydraulic sewer flood risk to the local area is not increased.

For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Strategic Catchment

Planner

[growth.development@seve](mailto:growth.development@severn-trent.co.uk)

ntrent.co.uk

The Coal Authority

Planning Policy Team
Erewash Borough Council

BY EMAIL ONLY: planningpolicy@erewash.gov.uk

20 April 2020

Dear Sirs

Breadsall Neighbourhood Plan

Thank you for the notification of the 9 April 2020 consulting the Coal Authority on the above Neighbourhood Development Plan.

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the defined Development High Risk areas.

As you will be aware the Neighbourhood Plan area lies within the current defined deep coalfield. However the Neighbourhood Plan area does not contain any surface coal resources or recorded risks from past coal mining activity at shallow depth.

On the basis of the above the Coal Authority has **no specific comments** to make on the Neighbourhood Plan.

Yours faithfully

Melanie Lindsley

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*

Development Team Leader (Planning)