

Brailsford Neighbourhood Plan

Submission Draft

Regulation 16



December 2020

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CONTENTS

1	INTRODUCTION	3
1.1	Context	3
2	LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE	4
2.1	Legal Requirements	4
2.2	National Planning Policy Framework	4
2.3	Impact of Covid-19 and Postponement of Referendums	5
2.4	Planning for the Future White Paper	6
3	REGULATION 14 CONSULTATION	7
3.1	Relationship to adopted Development Plan	7
3.2	Relationship to emerging Local Plan	7
3.3	Brailsford Neighbourhood Plan	9
3.4	Ability to support new growth opportunities	9
3.5	Policy H1	9
3.6	Policy H2	10
3.7	Policy H5	11
3.8	Policy H6	12
3.9	Policy TMA1	14
3.10	Policy GSL2	14
3.11	Policy LW1	15
3.12	Policy CW3	15
4	Site Submission	17
4.1	Land off Main Road, Brailsford.....	17
5	Conclusion.....	19
5.1	Summary	19
5.2	Specific Area of Concern	19
5.3	Contact and Next Steps	19

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1 INTRODUCTION

1.1 Context

1.1.1 These representations provide Gladman's response to the Brailsford Neighbourhood Plan (BNP) under Regulation 16 of the Neighbourhood Plan (General) Regulations 2012.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in contributing to the Development Plan preparation process, having made representations on Local Plan and Neighbourhood Plan planning documents and participated in many Local Plan and Neighbourhood Plan examinations. It is on the basis of this experience that the comments are made in this representation.

1.1.3 Through these representations, Gladman provides an analysis of the BNP and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the BNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.

1.1.4 Gladman has land interests in Brailsford at land off Main Road. Gladman consider the site to be available, suitable and achievable for residential development and would welcome the opportunity to discuss the delivery of this site in association with the Parish Council and for its consideration as a site allocation within the draft Plan.

1.1.5 Gladman welcome the opportunity to comment on the draft plan and request to be added to the Council's consultation database so that we can be kept up-to-date with the neighbourhood plan's progress and future consultations. Should the Examiner decide it is necessary to hold an examination in public, then Gladman respectfully request that we are afforded the opportunity to participate at the hearing session(s) to discuss the issues raised.

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the BNP must meet are as follows:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

(d) The making of the order contributes to the achievement of sustainable development.

(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”

2.2 National Planning Policy Framework

2.2.1 On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. This version was itself superseded on the 19th February 2019, with the latest version, largely only making alterations to the Government’s approach for Appropriate Assessment as set out in Paragraph 177, clarification to footnote 37 and amendments to the definition of ‘deliverable’ in Annex 2.

2.2.2 The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

2.2.3 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area

and Local Plans should meet objectively assessed housing needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

- 2.2.4 The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that Brailsford Parish Council can assist Derbyshire Dales District Council (DDDC) in delivering sustainable development and be in accordance with basic condition (d).
- 2.2.5 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.
- 2.2.6 Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.
- 2.2.7 Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

2.3 Impact of Covid-19 and Postponement of Referendums

- 2.3.1 Following the impact of COVID-19, the Government introduced new legislation through the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020. This legislation came into force on 7 April 2020.
- 2.3.2 In the Planning Practice Guidance, the government explains how the legislation impacts upon Neighbourhood Plans:

“What changes have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic?”

The government has been clear that all members of society are required to adhere to guidance to help combat the spread of coronavirus (COVID-19). The guidance has implications for neighbourhood planning including: the referendum process; decision-making; oral representations for examinations; and public consultation. This planning guidance supersedes any relevant aspects of current guidance on neighbourhood planning, including in paragraphs 007, 056, 057, 061 and 081 until further notice.

Referendums: All neighbourhood planning referendums that have been recently cancelled, or are scheduled to take place, between 16 March 2020 and 5 May 2021 are postponed in line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020 until 6 May 2021”.

- 2.3.3 A referendum for the BNP therefore will not be able to happen until at least 6 May 2021 in accordance with the legislation.

2.4 Planning for the Future White Paper

- 2.4.1 On 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to ‘radically reform’ the planning system. The proposals are seeking to streamline and modernise the planning process.
- 2.4.2 The White Paper Consultation closed on 29th October 2020 and it is important the Parish Council keeps abreast with the proposal and implications this may in turn have on the preparation of the BNP. Timescales remain uncertain however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.
- 2.4.3 A further consultation closed on 1st October 2020, which proposed immediate changes to the current planning system¹. Of significant note is a proposed revised standard method for calculating local housing need, which when implemented will be used as the basis for Local Plans created prior to any changes outlined in the White Paper. The revised methodology proposes to incorporate a percentage of existing stock as the baseline of the calculation. The Parish Council should be mindful of these changes and the potential impact to the BNP and the need to undertake a review of the neighbourhood plan in the near future due to DDDC undertaking a review of its Local Plan.

¹ Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

3 REGULATION 14 CONSULTATION

3.1 Relationship to adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the BNP, and the Development Plan which the BNP will be tested against, consists of the Derbyshire Dales Local Plan (DDLPL) which was formally adopted by DDDC on 7th December 2017. The DDLPL sets out the Council's overall vision, objectives and suite of policies for future development of those parts of the Derbyshire Dales that lie outside the Peak District National Park for the period 2013 – 2033.
- 3.1.3 Within the adopted Local Plan, Brailsford, along with 10 other settlements, is identified as a third tier settlement. These villages possess some facilities and services that, together with local employment, provide the best opportunities outside the first and second tier settlements for greater self-containment and are able to accommodate new sustainable growth opportunities.

3.2 Relationship to emerging Local Plan

- 3.2.1 The Parish Council should be mindful that the DDDC has confirmed its intention to commence a Local Plan Review in 2021². Whilst the Council has yet to commence work on its Local Plan Review, the Parish Council will need to ensure that the BNP allows for sufficient flexibility so that it is able to react to changes that may arise as a result of the Local Plan Review.
- 3.2.2 Indeed, the BNP should be drafted with sufficient flexibility to ensure that conflicts are minimised over the plan period to avoid the risk of the BNP being overridden by a future Local Plan. This will help ensure that the BNP is capable of being effective over the duration of its plan period and the proposed policies are not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

“if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).”

² Derbyshire Dales – Local Development Scheme October 2020

- 3.2.3 Following the changes to coronavirus regulations (as noted above), the qualifying body must be aware of progress that may happen on the emerging Local Plan before the BNP is able to proceed to referendum and check there is no conflict arising between the plans.

3.3 Brailsford Neighbourhood Plan

3.3.1 This section is in response to the BNP consultation document and its supporting evidence base. Herein, Gladman highlight where modifications will need to be made for the Plan to meet the basic conditions.

3.4 Ability to support new growth opportunities

3.4.1 Brailsford is identified as a tier 3 settlement in the DDLP and the BNP references its position with regards to the settlement hierarchy in the supporting text at page 14. This does not provide a true reflection of the Brailsford as identified in the DDLP as it does not state that the settlement has a 'limited' level of facilities and services. The DDLP states:

*"These villages possess **some** facilities and services that, together with local employment, provide the best opportunities outside the first and second tier settlements for greater self-containment. They will provide for reduced levels of development in comparison to higher order settlements in order to safeguard and, where possible, improve their role consistent with maintaining or enhancing key environmental attributes..."* (emphasis added)

3.4.2 Brailsford is well positioned to accommodate new growth opportunities due to its location along the A52 arterial route between the City of Derby and the Market Town of Ashbourne.

3.4.3 The settlement is well served by a range of services and facilities including the Village Institute, the Parish Church and Methodist Chapel, GP surgery, pharmacy, a post office, shop, pub and restaurant, two cafes, four specialist shops and more.

3.4.4 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.

3.5 Policy H1

3.5.1 In principle, Gladman support the inclusion of the above policy which seeks to provide a range of housing types, mix and tenures to meet housing needs of the Parish. However, Gladman is concerned with the emphasis on two and three bedroom dwellings as the delivery of new homes will be dependent on the housing needs of the area. As housing needs can change over time, there is a real risk that this policy could become outdated as new evidence of local needs comes to light. However, Gladman is concerned with the emphasis on one to two bedroom homes as opposed to larger properties as this does not cater for families looking

for larger homes. The policy should instead 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.

3.5.2 Gladman also question why developments should be designed as small scale clusters and the Plan should not be seeking to limit the amount and scale of housing that could be provided. This is particularly important given the fact that 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. Furthermore, 'small scale clusters' is not defined in the policy wording or the supporting text and is therefore inconsistent with paragraph 16(d) of the Framework which requires development proposals to be clearly worded and unambiguous so it clear how a decision maker should react to a development proposal.

3.5.3 Whilst Gladman recognise that this policy also seeks to cater for the needs of the elderly and people with disabilities by requiring development proposals to provide bungalows, this may not be achievable in the context of small scale development and the need to take into account the local characteristics of a site. As such, this element of the policy should be amended so that 'support' is provided to developments which provide bungalows to assist the needs of the elderly and people with disabilities.

3.6 Policy H2

3.6.1 Policy H2 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.

3.6.2 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. In this regard, whilst the policy allows for development within the settlement boundary in accordance with the adopted Local Plan it is silent on matters beyond this revised boundary.

3.6.3 Gladman do not consider the use of settlement boundaries in circumstances where it would preclude the delivery of otherwise sustainable development from coming forward. The NPPF2019 is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on edge of settlements does not accord with the positive approach to growth required by the NPPF2019.

- 3.6.4 Furthermore, Policy H2 is not in accordance with Policies S2 and S4 of the adopted DDLP. Policy S4 of the adopted Local Plan is clear that:

"Planning permission will be granted for development where... (i) Development on non-allocated sites on the edge of defined settlement boundaries of first, second and third tier settlements (Policy S2) in circumstances where there is no 5 year supply subject to consideration against other policies in the Local Plan and the provisions of the NPPF"

- 3.6.5 It should be noted that as part of the Local Plan Examination the Inspector noted that Policy S5 of the Local Plan as previously worded went beyond the requirements of national policy and modifications were required to ensure consistency with national policy to allow a flexible approach to development beyond the settlement boundary³. Gladman suggest that this policy should be modified and worded more flexibly to ensure the policy is in compliance with the adopted Local Plan and in order to ensure compliance with paragraphs 11 and 16(b) of the NPPF2019 and the requirement for policies to be sufficiently flexible to adapt to rapid change.

- 3.6.6 In this regard, Gladman submit that 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. Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner's Report states:

"...Policy GMC1 should be modified to state that "Development ...shall be focused within or adjoining the settlement boundary as identified in the plan." It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan."

3.7 Policy H5

- 3.7.1 Gladman do not consider this policy to be in accordance with national policy as it states that "large-scale developments within or adjacent to the Brailsford conservation area which could impact on the area as an entity, create loss of significance and/or substantial harm will not be

³ Inspector's Schedule of Main Modifications to the Derbyshire Dales Local Plan – MM9 and MM10

encouraged or promoted.” Whilst Gladman recognises the Parish Council’s desire to protect its heritage assets, this policy does not have regard to national policy which states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

3.8 Policy H6

3.8.1 Policy H6 states all new development should meet the following criteria set out in more detail in the Design Principles Statement. Gladman note that Policy H6 is a wide ranging design policy that is a ‘catch all’ type of policy covering various elements. While the government has shown support for development to incorporate good design principles, Gladman would note that the Framework also states:

“To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified.”⁴

3.8.2 Whilst Gladman recognise the importance of high-quality design, in accordance with the requirements of the Framework (above), design policies should not aim to be overly prescriptive.

3.8.3 Policies require some flexibility in order for schemes to respond to site specifics and the character of the local area. In essence, there will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles.

3.8.4 Indeed, the Design Principles Statement prepared by Urban Vision on behalf of the Parish Council sets out a more suitable approach to design considerations at Policy D1. Gladman believe that the Plan would be better served if Policy D1 was used in place of Policy H6.

3.8.5 Notwithstanding the above, Gladman raise concerns with reference to the following criteria:

⁴ NPPF (2019) – Paragraph 126

Landscape

- 3.8.6 The policy states that development should not create no significant impact on surrounding rural landscape, views, vistas, habitats and biodiversity. The use of wording is considered subjective and will likely lead to conflicting decisions through the development management process and would not accord with the requirements of paragraph 16(d) of the Framework. For a view to be identified for protection there should be demonstrable physical attributes that elevate its importance out of the ordinary, rather than seeking to protect views of the open countryside due to their pleasant sense of place. Gladman do not consider that the evidence base is sufficient nor robust enough to support identified key views and this should be revisited based on appropriate evidence. If identified views do not meet the tests required for identification, then these should be removed from the neighbourhood plan.

Energy efficiency

- 3.8.7 The policy further states that "construction should include the highest standards of emerging, waste and water efficiency..." This element is not defined as to what would be required to meet the highest standards of energy efficiency. In addition, the Written Ministerial Statement 2015 makes clear that technical standards relating to construction, internal layout or performance can only be progressed through a Local Plan based on need and viability. As such, it is suggested that this policy is modified, and the following wording is put forward for consideration:

"Development proposals which seek to improve the energy efficiency of residential dwellings will be supported."

Parking Standards

- 3.8.8 The policy requires at least two off road parking areas and garage to accommodate a mix of vehicles. Whilst Gladman acknowledge the need to accommodate private vehicles in development proposals, we submit that the requirements of this element of the policy are onerous and could place undue burden on development viability as it may not allow for the most appropriate layout in terms of design and master planning when taking into consideration other factors such as Public Open Space which may need to be included in a development proposal and thus reducing the overall level of development that could realistically be achieved.

3.9 Policy TMA1

3.9.1 Policy TMA1 when read as a whole would require any development within the settlement boundary to provide measures to meet traffic management and road safety regardless of the type of development being built.

3.9.2 In this regard, Gladman remind the Parish Council that planning obligations must only be sought where they meet all of the following tests:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and
- c) Fairly and reasonable related in scope and kind to the development.⁵

3.9.3 The level of development from small scale development within the settlement boundary will unlikely be relevant to investment in infrastructure as outlined in the criteria which provides the Parish Council's 'wish list'. Instead, the BNP will need to embrace larger development opportunities to ensure that the Plan is achievable and that both social and community infrastructure needed can be delivered through mechanisms such as s106 obligations in accordance with the tests outlined above. Budgetary constraints mean that the only realistic way of improving existing highways facilities and the provision of new community facilities will need to be funded and delivered through s106 planning obligations associated with the delivery of new housing development at a larger scale than what is currently being proposed. Accordingly, this reinforces the need to ensure flexibility within the Plan to allow sites not identified by the BNP to come forward and assist in delivering some of this essential infrastructure.

3.10 Policy GSL2

3.10.1 Gladman welcome the inclusion of the above policy and the Parish Council's ambition to increase the supply of public open space arising from new development opportunities such as Gladman's land interests at land off Main Road. Notwithstanding this, Gladman suggest a minor modification to the policy wording as follows:

"Developments which include the creation of green spaces accessible to the public, such as managed grassed space (ideally incorporating wildflower habitat), community gardens, children's play areas and establishment of new rights of way or accessible links to the wider

⁵ NPPF 2019 – Paragraph 56

footpath network and valued amenity green spaces will be ~~promoted in the consideration of any future development~~ **supported when considering future development proposals."**

3.11 Policy LW1

3.11.1 Gladman do not consider the approach taken by Policy LW1 to be appropriate and consistent with the requirements of the Framework as it seeks to maintain the areas status of Priority Sensitivity and seeks to direct future development away from areas of high landscape sensitivity and those which would affect prevailing vista, and/or would be visually prominent.

3.11.2 The supporting text to this policy states that whilst Brailsford Parish lies within a defined Primary Sensitivity area, the focus of this within the Parish are those areas surrounding Ednaston not Brailsford as the policy wording would suggest. It is therefore presumed that such designation does not apply to the Parish as a whole as the Areas of Multiple Environmental Sensitivity map is unclear on this matter.

3.11.3 Gladman has concerns with the above policy and its supporting text and the direction taken to protect the existing landscape area of the countryside. Gladman do not consider the approach as currently worded is consistent with the requirements of paragraph 170 of the Framework, as this policy seeks to set out a more restrictive approach than national policy. In this regard, the neighbourhood plan policies should contribute to and enhance the natural and local environment. Only valued landscapes, sites of biodiversity or geological values and soils in a manner that is commensurate with their status should be protected. The intrinsic character and beauty of the countryside should be recognised but the NPPF does not seek for this to be maintained to protect the rurality of an area.

3.11.4 Gladman reiterate the comments made in section 3.2 of these representations and submit that for a view to be identified for protection there should be demonstrable physical attributes that elevate its importance out of the ordinary, rather than seeking to protect views of the open countryside due to their pleasant sense of place and community support. Gladman do not consider that the evidence base is sufficient nor robust enough to support identified key views and this should be revisited based on appropriate evidence. If identified views do not meet the tests required for identification, then these should be removed from the neighbourhood plan.

3.12 Policy CW3

3.12.1 Policy CW3 seeks to encourage all future development to include investment in the provision of services and facilities as listed in the criteria attached to the policy.

3.12.2 In principle, whilst Gladman support the Parish Council's ambition to improve services and facilities available to the local community and note that the policy only seeks to encourage contribution to services, the proposed approach is not consistent with the requirements of national policy as not all development (e.g. a house extension) would be liable to contribute financially towards the criteria listed. In this regard, Gladman reiterate the comments made at section 3.9 of these representations with reference to paragraph 56 of the Framework and remind the Parish Council that developer contributions should only be required where they are necessary to address the unacceptable planning impacts of a development and so directly related to the impacts of the proposal that it should not be permitted without them. Contributions must be based on up-to-date robust evidence of needs and cannot be used to make up the funding gap for desirable infrastructure, or to support the provision of unrelated items.

3.12.3 Notwithstanding this, it is suggested that the criteria listed is included as an appendix to the Plan as opposed to the policy wording so that this can be kept up-to-date over the plan period. Gladman recommend that the policy is modified as follows:

"Where necessary to make development acceptable in planning terms, development proposals which improve infrastructure and facilities in Parish as identified in Appendix X will be supported."

4 SITE SUBMISSION

4.1 Land off Main Road, Brailsford

4.1.1 Gladman are promoting land off Main Road for residential development of up to 40 dwellings and associated community infrastructure. A Framework Development Plan can be found at appendix 1 of this submission.

4.1.2 The 2.39ha site is situated on the eastern edge of Brailsford and comprises of agricultural land. The site is bounded by existing residential development to its south and western boundaries. Interspersed hedgerows and trees form the sites northern and eastern boundaries, beyond which is open countryside.

4.1.3 Gladman consider that this site is suitable, available and deliverable and should be considered for allocation within the BNP for residential development. The delivery of this site will make a positive contribution towards housing supply in both the local and wider area whilst also helping to achieve the Plan's ambitions for improvements to local community infrastructure.

4.1.4 As outlined above, the site is well related to the settlement, with suitable routes for pedestrian and cyclists and is contained by physical features. The development would therefore represent a logical extension to Brailsford. Brailsford is identified as a third tier settlement in the adopted DDLP and owing to the range of services and facilities it is considered a sustainable settlement where new housing can be located to help meet the needs of the area.

4.1.5 Gladman would welcome the opportunity to discuss how the delivery of the site can make an important contribution to the supply of market and affordable homes in Brailsford. The site offers a suitable location for the delivery of the proposed development and is capable of delivering numerous benefits to the local community. These include:

- The delivery of the proposed site will help deliver much needed new homes and provide for a range of housing mix and tenures, including a policy compliant provision of affordable housing.
- The development proposal would contribute towards economic growth and have wider social benefits to the local community and increased footfall in local businesses. In addition, the site could provide a number of Full Time Equivalent construction jobs over the period of the build helping to address local unemployment in the industry and provide apprenticeship and training opportunities for local young people;

- Formal and informal public open space including provision of a new play area and green infrastructure will be provided with improved connectivity and access to Public Rights of Way;
- A range of improvements to enhance pedestrian accessibility to the site and the wider area; and
- Opportunities for additional ecological enhancements to deliver biodiversity net gains. This will be achieved through creation of new green infrastructure assets, comprising a variety of potential habitats and open space and reinforcement of existing trees and hedgerows around the site boundary to improve the quality and connectivity of habitats.

5 CONCLUSION

5.1 Summary

5.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the BNP must be consistent with national planning policy and needs to take account of up-to-date evidence. If the Plan is found not to meet the Basic Conditions at Examination, then the Plan will be unable to progress to referendum.

5.1.2 Through this consultation response, Gladman has sought to clarify the relation of the BNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

5.2 Specific Area of Concern

5.2.1 As outlined above, Gladman has highlighted a number of areas where the proposed policies do not accord to the requirements of national policy and require modification before being submitted for independent examination.

5.3 Contact and Next Steps

5.3.1 Gladman would be pleased to discuss the outcome of this representation and consideration of land off Main Road as a housing allocation with the Parish Council and Qualifying Body and invite the Parish Council to contact us in this regard.

5.3.2 Gladman request to be added to the list of consultees and contacted about the next stages of the Neighbourhood Plan. Should the Examiner decide it is necessary to discuss these matters in a public forum then Gladman respectfully request that we are provided the opportunity to discuss these matters at the hearing session(s).

