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Telephone: [REDACTED]
Ask for: David M Dale
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Our Ref: PM/DMD/Breedon on the Hill
Neighbourhood Plan
Your Ref:
Date: 27 August 2024

By email

Dear Madam/Sir,

Localism Act 2011 – Strategic Planning Comments

Breedon on the Hill Submission Draft Neighbourhood Plan 2020-2040

Thank you for giving Derbyshire County Council (DCC) the opportunity to comment on the Breedon on the Hill Submission Draft Neighbourhood Plan (BotHNP) 2020-2040. The comments below are DCC's Member and Officers' technical comments with regard to the climate change and Public Rights of Way aspects of the Plan.

Local Member Comments

Councillor David Muller, the County Council Member for Melbourne Electoral Division, has been consulted. Thus far, no comments have been received, but if I receive any I will inform you.

Officer Comments

3 Sustainable Development

Sustainable Development

DCC welcomes the inclusion of "mitigating and adapting to climate change, including moving to a low carbon economy" as part of the sustainable development objectives (3.1 bullet 3).

4 Natural Environment

Countryside Access

Overall, DCC reiterates its comments on the Pre-Submission version of the BotHNP, namely 'to welcome the recognition of, and references to, the Public Rights of Way (PROW) network in it'.

Paragraph 4.16 mentions 'an extensive network of Public Rights of Way that link communities to the surrounding countryside'. DCC welcomes this recognition of the PROW network, but would reiterate its previous suggestion that 'cross-border links to PROW in Derbyshire could also be mentioned here'.

DCC welcomes the intention to 'see the existing network extended and enhanced' (paragraph 4.18).

Policy BotH4: Countryside Access

DCC welcomes and supports the policy that 'Development should protect Rights of Way and wherever possible create new links to the network including footpaths and cycleways'

Biodiversity

Policy BotH5: Ecology and Biodiversity

Recognition of the role that improved biodiversity can play in reducing the impacts of downstream flooding in this policy is welcomed.

Flood Risk

Policy BotH7: Water Management

The preamble to the policy mentions climate change, but the policy itself does not. DCC would suggest that the policy wording should be amended to include reference to climate change.

5 Services and Facilities

Infrastructure

Policy BotH10: Infrastructure

DCC would suggest that Section A of the policy could perhaps include reference to making a financial contribution to improving energy efficiency or renewable energy generation at the school.

8 Transport

Whilst the BotHNP (paragraph 8.1) states that: 'Many traffic matters fall outside the scope of planning', nevertheless most neighbourhood plans have a transport policy, including in relation to walking and cycling, or (Section 106) contributions to transport infrastructure, for example, and DCC would suggest that such a policy should be included in the Plan.

Climate Change Omissions

In the document there are few details about what mitigation, adaptation, or a low carbon economy might look like for Breedon on the Hill. For example:

- There are references to the impacts of climate change on increased flooding, but there is no mention of other impacts such as a requirement for buildings to be adapted to prevent overheating, or the impacts of climate change on biodiversity. The Draft North West Leicestershire Local Plan relies on implementation of Building Regulations (Part 0 of the Future Homes Standard in 2025) in relation to overheating, but DCC would suggest that for clarity it would be helpful to have a specific policy on housing-related climate change issues, energy efficiency, climate adaptation, solar panels, and embodied carbon, for example, in the BotHNP.
- There are no references to the role that local renewable energy generation (for example community-owned renewables) might play in mitigating climate change. DCC would suggest that a policy on these should be included, particularly as the North West Leicestershire Draft Local Plan has identified areas potentially suitable for small, medium, and large-scale wind, some of which cover the area of this Plan.

- Beyond broadband and mobile phone connectivity, there is no reference to what form the low carbon economy might take.

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

Yours faithfully



David M Dale
Strategic Planning Team and Joint Chair: Central Local Information Partnership (CLIP):
Planning Sub-Group