

Comments

Main Modifications to the Local Plan (18/02/19 to 01/04/19)

Comment by	Mr Anthony Poulter (1208088)
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To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1

MM17 and 18

**Do you consider the proposed modification is:
(please mark the appropriate box)**

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?

.	Is it justified?
.	Is it consistent with national policy?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

Dear Sir,

I write to you on behalf of Brettenham and Kilverstone Parish Council to object to some of the modifications to Development Requirements.

The rural housing policies presented in the Local Plan were the subject of significant local engagement and were developed in parallel to the considerable effort by both the communities and councils in the preparation of the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan, made in February this year. The aim of this Neighbourhood Plan is to integrate the development of 5,000 new homes, and their occupants, capsulated in the Thetford Area Action Plan (TAAP), into the existing communities and maintain the rural nature of the parishes. This aim is supported by the Local Plan's approach to development in smaller villages, and in other small rural settlements and hamlets, that have, in the past suffered from developments that have resulted in harm to local character. The Parish Councils supported intention of Policies HOU4 and HOU5 to provide locally distinctive policies to give a clear and consistent approach to development in the smaller villages of our rural area. Accordingly, Brettenham and Kilverstone Parish Council considers that that the Main Modifications proposed to Policies HOU4 (Villages with Settlement Boundaries) (MM17), and HOU5 (Small villages and hamlets outside of settlement boundaries) (MM18) are unsound.

It is something of an anachronism that both Brettenham and Kilverstone have settlement boundaries in their parishes because they are intended to limit Thetford; accordingly they are not specified in policy HOU 4. It is therefore unclear whether policy HOU 4 would apply to either parish but, if it does, then MM17 removes the dwelling threshold of 5 dwellings from the Policy with the words 'minor development' from criterion 1. The effect of this modification is that it would potentially allow larger scale developments (10 or more) on the edges of Thetford resulting in disproportionate additions to the character and appearance of the rural settlements to the east of the "Thetford" Settlement boundary but within Brettenham parish. The same point is equally valid for Kilverstone.

This concern also arises from Main Modifications proposed to Policy HOU5, where the words 'minor development' have been removed, as has the dwelling threshold of 3 dwellings. Specifically the weakening of the first paragraph where the revised wording would imply that the frequency of development occurring in such locations would be greater than just exceptional. This weakening is inconsistent with paragraph 79 of the National Planning Policy Framework (NPPF) which has clear criteria which it would be rare to comply with if the proposal is not for an essential worker, enabling the viability of a heritage asset or the conversion of an existing building.

In addition, the removal of minor development and the limit of 3 dwellings implies that major development could take place in such locations and certainly that development of more than 3 new dwellings would be acceptable. This is again at odds with paragraph 79 of the NPPF which seeks to avoid the development of isolated new homes that do not meet the criteria referred to in the first part of this objection

Finally, the removal of criterion 3 of the policy is of considerable concern. Should, the Inspector wonder how it can be demonstrated that a parish council is supportive of a proposal and, at what point in the process that support should be demonstrated, the Criterion 3 policy could be reworded:

"3. Where the policies in the relevant "made" Neighbourhood Development Plan would support such a proposal."

Yours faithfully,

A M Poulter OBE

Chairman, Brettenham and Kilverstone Parish Council

Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.

Retain the wording for HOU 4 and 5 in the Emerging Local Plan before the proposed modification

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified? . By email to my email address