

Comments

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

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Consultation Point	Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries (View)
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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

MM18 Policy HOU 05 Small Villages & Hamlets Outside of Settlement Boundaries

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?

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

A) MM18s proposal for complete deletion of clause 3, as below:

~~“3. It can be demonstrated that there is appropriate support by the parish council;”~~

The effect of this would be to further 'centralise' any power or influence on decision-making, removing it from the location, and the historical environment and culture to be actually affected, and the community which has best knowledge of those local circumstances, (even to faraway places like Belfast I believe, and previously Yorkshire? - under current acceptable out-sourcing practices.)

This seems totally at odds with intentions repeatedly expressed at all levels regarding aspirations and expectations for de-centralisation (Localism Act 2011 ***“The aim of the act is to facilitate the devolution of decision-making powers...to individuals and communities.”***)

Extracts from: **The Balance of Power: Central and Local Government Committee. Sixth Report 2008-2009**

“We note the lesson from English history that, whilst the balance of power has been subject to pendulum swings, the predominant trend, particularly since the second world war, has been for central government to increase its powers and responsibilities, at the expense of local government.”

Context: (extracts from p.5)

“we are convinced that the balance of power matters. It matters because at its heart is the challenge of improving the lives of local people and local communities, and determining where the decisions that affect them directly should be made....

Even more fundamentally, it matters because the strength of Britain’s famously unwritten constitution depends upon a strong democracy.... If popular participation at the grass roots continues to decline in this country, then ultimately the national body politic will not be immune from the consequences. Flourishing grass roots are only likely where local people understand what local government is responsible for in terms of both policy and resources, where they can hold to account local government for its performance, and where, crucially, they believe that local government can make a real difference.”

Removal of this clause from Breckland’s ‘Local’ Plan is a direct and fundamental move against the intentions for localities in the ‘Localism’ Bill. What scope would remain for small parish councils such as Oxborough to influence anything at all - let alone make any “real difference”?

Whilst PCs would presumably continue to be assigned responsibilities, amid policies, codes of practice around accountability, transparency, financial governance etc etc MM18 aims to remove even the minimal vestiges of power/right to influence that remain with a PC. What calibre of councillor can we possibly expect to attract to such a thankless role? What positive interest/involvement/commitment from the public /the community could a PC expect to attract when it comes to elections, meetings and at the end of the day...volunteers to mend the bus shelter ?

The substitution in the introductory paragraph itself seems to present active divergence from ‘localism’ - “that policies within the ~~Local Plan~~ Development Plan

B) Partial deletions from clause 2 as follows:

“It is minor development of an appropriate scale and design to the settlement of up to 3 units;”

This clearly paves the way for major developments of any size with no limit whatsoever. What will be considered “appropriate” by distant planning officers? “Appropriate” for **whom** and for **what** one might ask.

This whole clause would best be omitted for the lack of usefulness and specificity it contributes, while somewhat dangerously permitting so much.

This is not sound regarding effectiveness.

Where has this element of unlimited numbers suddenly come from within the lengthy consultation process? It is not justified.

What has happened to the previously quoted/included limit of 10% increase in dwellings over 10 years - without presenting any justification?

This in no way reflects the Reasoned Justification.

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

. Sound? No

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

. Is it positively prepared? No

. Is it justified? No

. Is it effective? In doing what? I'm sorry, but I don't understand this question.

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

In respect of how these MMs stand to impact on Oxborough, they are unsound with regard to current statutory requirements, intentions, direction, priorities and practices.

1 These proposed Main Modifications do not reflect what emerged and seemed to have been accepted within the lengthy and thorough consultation process, with all the significant emphasis, time and money it gave to "local engagement." I fear words are losing their meaning. Unsound because no justification is given: ineffective in achieving stated objectives and compliance with statutory intentions.

2.Emphasis on claims of "enhancing the historic nature and connectivity of communities" and having regard for "the character and distinctiveness of the rural scene," "sensitive infilling and rounding off ..." conflicts with removal of input from PCs. For small or remote settlements in particular, local parish input surely has to be seen not only as having some role – but a critically important role - especially regarding individual distinctiveness, when such small areas as Oxborough are very unlikely to be known to the sole, decision makers which MM18 proposes, with essential PC support for proposals removed.

This historic village has already suffered in the past from large scale / non-sympathetic 'developments' which already weakens its case for salvaging its core history and distinctiveness.

Unsound: Ineffective in achieving stated objectives. Unjustified. Contrary to the Localism Act 2011

3. Proposed Main Modifications do not reflect the clauses listed (page 50) as Reasoned Justification

3.27 states: "by allowing clearly identified, evidenced appropriate small scale development to meet local needs through criteria based policy." However, none of these conditions appears within HOU5.

None of the following words is even mentioned: "small" "evidenced ... local needs" "carefully managed...in a manner which is more restrictive than for those named settlements with boundaries" The words "minor development" are even actively deleted!

Unsound: Ineffective. Complete divergence from the Reasons for Justification given.

1 How is incompatibility between the following two statements to be addressed?
Supporting "Infill...defined as: building taking place on a vacant plot in an otherwise built-up street frontage" [Reasoned Justification 3.29]

While also -

Supporting no harm to/undermining of: "a visually important gap that contributes to the character and distinctiveness of the rural scene." [HOU 5 clause 4/5]

Not positively prepared (if I've interpreted this correctly) or Not effective?

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

Reject these proposed Main Modifications to the Local Plan and accept the Council's recommendations.

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

How would you like to be notified?