

## Comments

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

<b>Comment by</b>	Mrs Mark Reed (1208069)
<b>Comment ID</b>	96
<b>Response Date</b>	31/03/19 11:53
<b>Consultation Point</b>	Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**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**

HOU 05, but we are of course commenting on the final version, as published as document Ex125, rather than the incorrect one published in the Main Modifications document in paper version and on-line.

**Do you consider the proposed modification is:** . Legally compliant?  
(please mark the appropriate box) . Sound?

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?** . Is it positively prepared?  
. Is it effective?  
. 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?**

NPPF Para 16 (d) states that the Plan should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals."

Where development would be limited ' apart from in exceptional circumstances where planning permission may be granted subject to being supported by other policies within the Local Plan' has been changed to "limited apart from where it would comply with other policies within the development plan. ' As I'm sure you would agree the tone of the two is very different, seemingly in the first instance, development is not encouraged to its not being discouraged. Furthermore, the tone suggests a lack of clarity which could be represented by developers as they see fit for their purpose. The policy has been through a long and detailed process with public consultation which has changed considerably over time:

Initially there was to be a very limited (5%) increase in the life of the plan which was to be backdated to 2011, based on the size of the Parish ( in this case 127 houses), which would mean that in the case of this parish has already been exceeded;

The Parish Council's decision would be fundamental in the decision on planning. The parish councils support (or otherwise) is not relevant. I would suggest that this presents an eroding of local democracy and a lack of understanding that parish councillors are the people on the ground in the area, intelligent individuals who are aware of the need for housing but wish to ensure that the sustainability of the area and the character of the place they inhabit is sensitively developed. Furthermore, the Stow Bedon and Breckles Parish Council, in association with the majority of local councils have and do recommend that houses are built but in a natural and sustainable way in line with the size of their village. ;

The removal of the Settlement Boundary would mean that the parish was seen as unsustainable and hence housing would not be excessive.

PD05 2 formally read : ' minor development of an appropriate scale and design to the settlement of up to 3 units', however the 'minor development' and 'up to 3 units' is to be removed. Which would lead one to question on what scale developments can or would be limited. This is not in line with NPPF Para 16d as this is not clear.

PD05 3 also required the "appropriate support" of the Parish Council, locally elected government with close association with the voters of the parish.

The un-elected Inspector has changed both of these clauses leaving these open to interpretation thus rendering the Policy open to debate as it does not have one obvious meaning, unlike the Local Plan as proposed by Breckland, which was "evident how a decision maker should react", as required by the NPPF.

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

Restore the original wording in full, with the exception of the reference to local plan now being the development plan

**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