

## Representations made on behalf of Brettenham & Kilverstone Parish Council

### Consultation on the Main Modifications to the Local Plan – Breckland Council

The following representations are submitted on behalf of Brettenham and Kilverstone Parish Councils in respect of the consultation on the Main Modifications to the Breckland Local Plan held between May and July 2019.

The Parish Councils' representations are as follows:

#### 1. **General Points**

- a. **NPPF vs Local Plan Policy** Given that national planning policy has a focus on delivering housing and that applications should be approved where they accord with relevant planning policies (NPPF para 11 c)), it is essential that development plan policies are clear, unambiguous and capable of implementation. The Parish Council believes that some of the proposed amendments to policy significantly 'water down' the protection offered by the policy to the point that the purpose of the policy is undermined, unclear and not implementable; and therefore not sound.
- b. **Primary Care** The Local Plan is practically silent on the provision of new primary care facilities despite substantial growth being promoted in its policies. Thetford is a key example of where significant growth is being proposed and where there will be a significant population increase yet only passing regard and small mention of 'medical facilities' is made. There does not appear to be an effective mechanism in place that would allow for the need for primary care generated by the planned growth to be highlighted let alone delivered and there should therefore be an appropriate trigger in the plan to enable this.

2. **Thetford Settlement Boundary** Part of the settlement boundary for the built up area of Thetford extends into Brettenham and Kilverstone Parishes. There is no reference in the plan or within the main modifications to the fact that development within Brettenham and Kilverstone Parishes is included within any form of settlement boundary.

*There is a list of villages with settlement boundaries within the plan but neither parish is included in this list. As currently set out, the inference would be that both are 'villages without settlement boundaries' when this is not the case. This factual error requires correcting. There should be a cross reference between the Thetford Settlement Boundary and the parishes of Brettenham and Kilverstone so that it is clear to the reader that there is a settlement boundary that falls within their parish.*

*A map of the settlement boundary for Thetford (which extends in Brettenham and Kilverstone) should be include within the Plan.*

3. **Villages not mentioned** In addition there is no reference to **Rushford, Kilverstone or Brettenham** – they should be included in the list of villages without a settlement boundary.

4. **Primary Care Facilities** There is no mention of Primary Care Facilities for the SUE, which is a serious omission.
5. **MM9 – Para 2.48** This paragraph should also refer to the Croxton, Brettenham & Kilverstone Joint Neighbourhood Plan (JNP) which is now a ‘made’ plan and is applicable to the urban extension.
6. **MM10 – Para 2.52** Objection to the revised wording which waters down the protection given to the countryside outside of settlement boundaries and does not reflect or refer to Policy JNP10 of the Joint Neighbourhood Plan which protects two identified areas for their landscape value and undeveloped character.
7. **MM11 – 2<sup>nd</sup> para** Objection to the revised wording which waters down the protection given to the countryside outside of settlement boundaries and does not reflect or refer to Policy JNP10 of the Joint Neighbourhood Plan which protects two identified areas for their landscape value and undeveloped character.
8. **MM15 – HOU3** Support for the reference to Development Plan rather than Local Plan here which includes Neighbourhood Plans such as the Croxton and Brettenham & Kilverstone Joint Neighbourhood Plan (JNP).
9. **MM17 – HOU4** There is a settlement boundary covering parts of the Parishes of Brettenham and Kilverstone and therefore the policy should refer to those as rural villages with settlement boundaries.

Objection to the removal of the figure of up to 5 dwellings and minor development.

How is ‘appropriate scale’ judged?

How is ‘significantly’ to be judged?

Objection to the removal of reference to community benefits which will result in development that presents no community benefit.

9. **MM17 – Paras 3.22-3.24** Objection to the removal of this text which defines community benefits
10. **MM18 – HOU5** Objection to the proposed revisions to this policy which significantly waters down the protection given to rural areas.

It is unclear how this policy would be applied to development adjacent to Arlington Way in Brettenham.

It is inconsistent with the NPPF para 79 which requires development in the open countryside to be exceptional and to be justified. The removal of appropriate scale and support from the parish council weaken the policy and could potentially lead to

development that would harm the gateway to Thetford (in Brettenham) that is protected under JNP Policy JNP3.

11. **MM116 – ENV01** The policy has become significantly watered down. The requirement for compensatory measures for green infrastructure is too weak and conflicts with the habitat regulations.

The map is inadequate and hard to read.

12. **MM118 – ENV02** The policy has become significantly watered down. The fact that ‘no adverse’ has been taken out would imply that development can still have an adverse effect and be permitted.

The proposed wording is vague and requires clarity.

The Map does not have a proper title and is difficult to read.

13. **MM119 – ENV03 SPA Amendments** Amendments proposed on page 105 have significantly weakened the SPA protection.

There should also be reference made to the JNP here.

The Map on page 181 of the revised plan is difficult to read.

14. **MM121 – Map 5.1** Difficult to read the map

15. **MM126 – ENV05 – Protection and Enhancement of Landscape.** This policy is difficult to implement and therefore is unsound.

How is ‘unacceptable’ change to be identified if this policy is to be implemented?

16. **MM133 – ENV10 – Renewable Energy** If the aim of the policy is to reduce the carbon footprint of the District then the policy is unclear and ineffective. It requires rewording to be effective and perhaps encourage wind or solar generation.

17. **MM151 - COM04** There is no reference to primary care in the description of community facilities which is a serious omission.