

8 September 2021.

**New Buckenham Proposed Neighbourhood Plan
Consultation on the Submission Version – September 2021.**

PC – Parish Council

NP – Neighbourhood Plan

Plan – The proposed Neighbourhood Plan

S.17 – A survey for residents only, conducted in Autumn 2017, over four years ago.

Opening comments.

What follows is lengthy; I make no apology. Having known the village for about 60 years I am concerned the Plan is stifling and not for the long term benefit.

1. It appears not to meet the Basic Conditions for Sustainable Development.
2. There is no real future vision of what the neighbourhood would be like in 2036 so the Plan may not comply with the published Strategic Aims.
3. There is insufficient ‘proportionate robust evidence’ to support the protectionist appearance of the Plan.

Perhaps I have looked over the papers in more detail and with justifiable scepticism than many other people. I have some experience of progressing planning applications at New Buckenham and perhaps more than others I have seen how things go.

I have been accused of being an absentee landlord living in Kent, and take this opportunity to mention that I now live very nearby and am in the village at least several times weekly. The outcome of this proposed Plan is as personally important to me as anybody else associated with it.

It is possible sometimes to read a report or opinion and find it seems to have arrived, despite all the mentioned analysis, at an outcome which from the outset it preferred. In my opinion this Plan does exactly that. It arrives at a predictable destination.

I hope the inspector will visit the Plan area and meet some of those affected by it.

Observations on the process generally;

1. It has been said that a significant number of Neighbourhood Plans have been produced with the aim of trying to prevent development. This one seems not to escape that theme. I am not convinced the plan ‘contributes to the making of Sustainable Development’; instead it would seem far too easy for users of this plan to pluck from

its pages various ways to ambush a planning application and too few real routes to facilitate one. No areas are allocated for new housing. The parish council has said it came about primarily from considerations about village development. The rest of the issues it addresses are not the primary reason for its being.

2. The Plan does not clearly identify, nor has the point been made clear to consultees, that it is the *policies* in it that will take precedence as to the way it is interpreted and applied over and above the *statements*, so wording in the *statements* that seems to provide opportunities will be overruled by the *policies*.
3. As the making of Sustainable Development is one of the main tests that I understand the inspector will consider then it may be that the Plan in its present form will fail. It has not been made clear that the Plan may become an ‘Order’ and thus a set of perceived rules that may be reached for in future, to be cited against development long after its authors are gone, by people who as yet may have never even heard of New Buckenham. Many of the S.17 participants (over four years ago) are already gone. There is no vision for the long term future in the plan.
4. I understand that the legislation requires the inspector to make an order as to whether the area of the referendum should be extended beyond the neighbourhood area to which the plan relates. That may also create opportunities for the inclusion of ‘*all those affected by*’ the Plan, i.e. the landowners (90% of this Plan area) who were denied participation in S.17 or a place on the Working Party, inclusion in the referendum process in some way.
5. The PC is at risk of claims if it has acted in a way that breaches its duty to champion the needs of everybody in the parish equally, for example by failing to consult everybody fully. Exclusion of the landowners from the process in the same way as everybody else may be argued as a breach of that duty. The approach taken may place a considerable future burden on the parish council that could have been avoided.
6. The Plan identifies other nearby communities as ‘Service Centres’ and identifies the lack of or decline in these essential benchmarks at New Buckenham as reasons against development, but surely a healthy future would be one that encouraged availability of things like busses, shops, pubs, cafés and so on, otherwise there is a downward slide towards a community with none of those things. The lack of these things is used in this Plan to downplay development potential.
7. Given the importance of the privately owned Castle and adjoining Scheduled Land, it has not been made clear if there are any other future intentions concerning that property and New Buckenham if the Plan were to succeed, leading to inferences that property had taken a step towards inclusion in ‘New Buckenham’ (unwelcome to Old Buckenham Parish Council). The inspector is invited to consider if the Plan makes sufficient coverage of this issue. Do references to ‘significant buildings’ or

‘historically important buildings’ in this Plan, have any other as yet unpublished connotations? Which buildings does the parish council have in mind?

8. More should be done to explain whether the Plan becomes effective as a Neighbourhood Development Order? enabling certain types of development without Planning Permission. The Plan identifies various *policies* that can be used against development by future stakeholders. It makes it too easy to go against planning applications citing a policy or an interpretation of a policy in the Plan, derived in part, it says, from the outcome of S.17, but a great deal has changed since that survey over four years ago.
9. Working from home ‘WFH’ is a huge factor evolved even more out of Covid but the Plan scarcely recognises that. It restricts or discourages cabling for broadband which is so much needed, as is a mobile ‘phone signal urgently necessary but not pushed ahead by this plan. Instead, the backward looking ‘history’ view is prioritized.
10. At Wantage, Vale of White Horse, August 2016. The proposed Plan failed. Examiner John Parmiter found that the plan was "overly focused on protecting the locality’s many features, too often without sufficiently robust evidence to do so". That proposed plan also failed to provide Sustainable Development. I have highlighted the repetitious mentions of an ancient village layout, the diagrams in the Plan that exclude the enlarged village as it actually is, (instead showing only part of it) and which perhaps make too much mention of a ‘Moat’, only a few fragments of which exist and which was being abandoned certainly by the early 1600s. There is no mention that in fact 30% of the dwellings are outside the *assumed* ‘Moat’ line.
11. Has the inclusion of the castle, which sits happily in Old Buckenham Parish, resulted in this Plan overplaying aspects of the locality - as hurdles to development? Why add the castle if not to use it as extra ballast for the ‘history’ argument? There are old and important features in the locality, as there are in a great many rural areas in Great Britain, but those things are a part of the locality and not the entirety of its being. Were the castle and scheduled meadows borrowed into the Plan just to bolster its preference against growth or development of the village?
12. There is a danger in a locality being promoted as being *‘more special than somebody else’s special locality’*. By all means provide new housing but put it somewhere else, shame but we can’t build it here! The Plan and hence the community can’t just opt out of building – everywhere has a duty to provide housing as per O’Riordan (see Professor O’Riordan’s advice below).
13. S.17 is mentioned as having been secure and confidential and claims a very high response rate. In fact any three random numbers provided online access to it, suggesting potential flaws in the outcome. The entry code system was not secure. Para 5.2.10 of the consultation statement is flawed and incorrect, anybody could get into it.

Also, the landowners were not afforded the confidentiality provided to the selected participants in S.17, even the landowners names are published in the consultation bundle, although actually not correctly. Will the inspector review the entire S.17 response material as it is presumably preserved in case that is required?

14. The consultation states only one landowner was not found, but others have told me they did not hear from the parish council or perhaps only at the last minute.
15. The consultation statement states the parish council's team initially comprised members of the village society. It was also the village society which had previously arranged a very well attended presentation from Professor O'Riordan who advised as to the importance of providing housing for younger and older people but despite that close link, the Plan makes no proposals as to how such housing might be provided and seems not to have fully taken on board the advice of the eminent Professor which was that villages must grow to survive, and identify incubator land for that purpose. Instead the Plan seems to display an underling preferred outcome against growth and repeatedly refers to an old village boundary for that reason.
16. The Draft Plan stated reasons such as wildlife and the 'original' grid pattern village with 'Moat', as reasons why the village could not grow. Whilst the Plan as now published has sought to address points raised in that consultation, such as the claimed presence of Great Crested Newts in fact not being there at all (see page 23 of the Wildlife report – none within 2km) and Biodiversity Net Gain, the Plan as now published still retains a theme against development. The adjustments to accommodate first round consultation remarks do not seem to have really altered what reads as the preferred outcome of the Plan.
17. It appears the owner of the castle and surrounding 'Scheduled' (as part of an Ancient Monument) land was consulted at a very early stage of the proposed Plan, but the family farming partnership that owned the land further to the west told me they weren't consulted before their land was included. Old Buckenham parish council were asked to approve inclusion of part of Old Buckenham parish before the matter was discussed in New Buckenham Parish Council so the community of New Buckenham were not made aware beforehand.
18. The Plan makes no reference to the opportunities afforded by the *Self-build and Custom Housebuilding Act 2015*, promoted by the neighbouring Norfolk MP. Over the life of the Plan this legislation may become much more relevant so perhaps the Plan should have accommodated it.
19. Figure 24 in the Consultation Statement incorrectly identifies ownership of the castle and surrounds. The garden of the adjacent private house is shown very much larger than the registered curtilage. (I was an owner of both for over 30 years) Several landowners owners told me they were not contacted, publicity and communication

with landowners has been minimal which may not comply with the requirement to fully inform *all those who may be affected by the Plan in a place where they are likely to see it*. Email updates for example, for landowners, were not employed. As mentioned this seems adrift from the published Communications Strategy.

20. The above, and other similar issues, cast doubt over and are adrift from compliance with various aspects of the ‘Communication Strategy’ published on 30th October 2016. For example; Para 4; ‘...to ensure the maximum involvement by the maximum number of people.... includes stakeholders.....and interested parties of every kind....’ That was not my experience.
21. It did not seem logical that the parish council published the results of S.17 in banner headlines long before a definitive list of all necessary consultees had been compiled and certainly before the landowners had been approached. This makes the ‘results’ unrepresentative of the full consultee base, in a rural setting where so little of the Plan area is within the built village and resident’s ownership.
22. The Draft uses wildlife as a bar to village growth. A bat survey took place in 2020 and was reported in the Eastern Daily Press ‘EDP’, the region’s main newspaper. I could not help wondering if the bat research had the underlying purpose of identifying bats as a hurdle to development. That EDP article states that *as a conservation village with listed buildings and a castle, the building of houses is not expected*. So far as I know there is no planning or other national policy which says that at all so one wonders why it was published in connection with a bat survey on behalf of the parish council for the Neighbourhood Plan.
23. I wrote to the parish council on September 27th 2018 reminding them about the village meeting in March 2016, at which professor O’Riordan gave advice, as follows;

Note of Public Meeting 19th March 2016.

On 19th March 2016 about ninety people took part In a Public Meeting arranged by the New Buckenham Society and independently chaired by the eminent Professor O’Riordan, very well connected with Norfolk and knowledgeable in sustainable rural communities.

Many people spoke. By then it was acknowledged that no site for new social housing existed within the built village. (A specially formed working party had not been able to identify one)

The professor highlighted; - Difficulties faced by young people wanting to stay in rural communities - The negative aspects of sucking young people out of rural communities - The importance of providing mechanisms for young people to stay in rural communities –

A need to avoid development being focussed around a small number of selected hubs leaving rural villages isolated and dying - The importance of providing new energy and water efficient housing - The importance of regeneration of socially balanced economies (in other words encouraging younger residents in order to avoid the ageing of rural communities) - The concept of ‘incubator land’ which is to build on, to pay for the future rented housing. - The importance of paying attention to the needs of both the elderly and younger people

Other speakers at the same meeting highlighted; - The high proportion of very old and many listed building houses in the village and the costs and access difficulties associated with these - Growth in several directions has occurred relative to the medieval village - Concerns about an ageing population in the village - Social and economic changes in the village over time and difficulties in finding new people to run and participate in village activities and committees - *Risks of allowing the village to become a pretty, historic, dead monument* - The need for fresh input to maintain vibrancy - To maintain village amenities and shops the village must grow - The need for new, energy efficient, well insulated, accessible housing suitable for young families. (My italics and underlining).

There is little evidence that the Plan has made real steps to identify ways to develop the Professor’s advice, instead the Plan seems to be pitched against development. There has been no public debate meeting since.

24. The few small parts of a ‘Moat’ are promoted as a bar to growth, when in fact a lot of the alignment is speculative/ assumed and the village has grown hugely. Of the great majority of the assumed Moat, there is no trace at all. It would be just as easy and accurate to have stated more positively in the Plan that; *‘...there are elements of an old Moat to be found but the village has grown very much since records show that it was being filled in as long ago as 1630 when Mr Gosling was allowed to build a barn over it. About 30% of the current parish housing is outside the assumed alignment of the Moat, including some houses several hundred years old. What remains of the historically important Moat should be preserved but to meet future needs and vibrancy the village must continue to grow...’*.
25. The first time I wrote to mention that the landowners had been unexpectedly excluded from S.17 the parish council responded that it had always intended to have a separate survey for landowners. The second time I raised the same point, a different reason was cited, such that those not on the voters’ role could not vote on the Plan so were excluded from S.17. This suggests that the parish council were developing reasoning as it went along and were unaware of the voters’ role point earlier. The implication is that there was a decision to exclude the landowners from the outset and reasons for that were being identified retrospectively. In fact neither reason prevented the inclusion of everybody in S.17.

26. In February 2021 I published a newsletter as I was horrified to find that little was known about the earlier experiences of the development of the plan particularly in relation to the landowners. It was also by then clear to me that the parish council was not mentioning various correspondences in its meetings or minutes. I am taking this opportunity to refer the inspector to that newsletter which contains many points relevant to this consultation.
27. Perhaps there ought to be an explanation as to why some of the maps/ diagrams of the 'village' in the Plan are not the whole village, seeming to highlight an older smaller central portion of what is now a much enlarged built environment.
28. Despite my raising the point repeatedly there remains no explanation as to why the Planning Consultant who was engaged, never produced a report? We were told it was merely delayed by her being unwell but it never appeared.
29. The draft Plan mentions the presence of Great Crested Newts as a point against development whilst at page 23 the wildlife report says there are no habitats for this species within 2km. The parish news mentions in September 2021 that some may have been found but this will be subject to formal verification. A Great Crested Newt photo which appears on page 33 of the Plan seems premature and ought not to have been published at a time when none had been found.
30. The Plan makes no proposals for what to do with £100k from the sale of the two Townhouses, (former PC owned rental properties) which funding should be applied to housing in the village as per the original trust/ charitable bequest – for housing. The money has been simply absorbed into PC general funds with no tie to housing. There was a fine opportunity here to advance housing needs, I wonder how many parish councils have such sums on hand?
31. In March 2021 I found a number of documents which are connected to this Plan, after trawling around the Breckland Webpages and elsewhere as follows;

 D11 20 NBNP comments - final draft v2_.pdf	06/04/2021 10:57
 New Buckenham NP HRA Final Report _Redacted (March 2021) .pdf	06/04/2021 11:09
 New Buckenham NP SEA Final Report _Redacted (March 2021 #) .pdf	06/04/2021 11:38
 New Buckenham NP SEA Final Report _Redacted (March 2021) .pdf	06/04/2021 11:22
 Printed decision New Buckenham Neighbourhood Plan - Application for...	06/04/2021 11:21
 Printed decision New Buckenham Neighbourhood Plan - Application for...	06/04/2021 11:19
 Printed decision New Buckenham Neighbourhood Plan HRA screening d...	06/04/2021 11:18

None of these were made public on the Neighbourhood Plan website. One is a 'Habitat Regulation Assessment', another is a 'Strategic Environmental Assessment'. Are these usual? Was there a proposal to identify part of the proposed Plan area to be classified in some way as a protected environmental zone or anything of that sort? If so where did that suggestion arise from? This question is important because the Plan

repeatedly implies wildlife as a hurdle to development which was also a clear theme of the Draft Plan.

The inspector is invited to consider if a failure to make this information promptly available and *'in a place where it is likely to be seen'*, was a breach of the requirements designed for that purpose.

32. In October 2020 I wrote to the PC, the parish clerk and others, setting out a proposal whereby I would donate sufficient land for five community houses, into a **Community Land Trust**, a corporate vehicle to ensure the houses remained available for local users, as houses run by housing associations 'RSL's' can become used by non-local occupiers and may eventually find their way into private ownership and the open market for example by 'Staircasing' defeating their original purpose. The proposal also 'fits' with the guidance offered by Professor O'Riordan and further, might apply the 'Townhouses £100,000' once again towards housing for locals. I had no reply, I re-sent the letter in December, still no reply. I hand delivered it to the parish council on the 1st January 2021. Almost two weeks later on 12th January, it was circulated a few hours before the January parish council meeting, being three and a half months after I first wrote. Para 2.5.12 of the Plan on page 41 is perhaps included as a response, but dismisses the idea and makes no reference to my offer of land into the Trust, instead saying there is no available land. This proposal should be revisited and the Plan adjusted to make more positive accommodation for it given the expected longevity of the proposed Plan. para 2.5.12 could easily instead have been drafted more positively as follows;' *A Community Land Trust is a useful way that new energy efficient housing for local people can remain within parish/ local control/ ownership and creates a trust that would provide those houses for renting out to local people. This avoids the houses passing into private ownership that can happen to Housing Association ('RSL') property. The hardest part of such a proposal is finding the land but New Buckenham is fortunate that a local landowner has offered to donate land for five houses into a Community Land Trust and this proposal should be developed. The Plan includes Policy [xyz] as a result* '

33. Growing the village for its future health, means having land that currently belongs to the landowners and yet they were excluded from S.17, the working party, the anonymity of consultation, and cannot vote in the referendum!

34. The Plan makes no mention of the farmers' and landowners' needs which are especially relevant just now given changes in farm financing and Brexit, and replacement schemes which are not yet clear, such as ELMS and the need to diversify. There is no part of the plan that demonstrates any thought to these issues which are integral to a rural parish. Any Plan policies that restrict diversification for farmers, such as discouraging building outside a perceived ancient boundary, tends to show the parish council has given no thought to them at all. Over the life of the Plan such diversifications may well bring commercial advantages to village businesses, if the

Plan is not negative about that potential. The parish beyond the built environment is viewed in the plan really only from a leisure perspective.

35. Para 5.6.1 of the Consultation Statement presents an inaccurate view of the contact made with landowners. Several told me they were not contacted or in one case at the very last moment. The contact made seemed to me to be minimal. It was originally proposed we might only be consulted by 'phone as it was thought *some might not be able to come to a meeting*, but we were never asked. The parish council did not reply to my two suggestions/ requests to have a landowner on the project despite land being 90% of the area concerned. The owners of one area of the 'Old Buckenham extra land' were excluded from consultation because it is said that property was in probate however that family farming partnership had other local registered owners of the land who could deal with the matter but they weren't approached. The letter that some landowners did receive asked only two relevant questions compared to over 30 multiple choice ones that invited participants in S.17 could consider. Again, this all seems detached from the PC obligation to champion the interests of everybody and non-compliant with the published Communications Strategy.

Comments on The Plan as published – 'Submission Version'

Paragraph numbers as referred to from the Plan;

36. The photograph at page 3 shows only the older aspects of the village and excludes many houses off shot to the right that are part of the built environment of the village and in the parish. The photograph also highlights the early road layout, perhaps seeking to promote that as the reality of the 'village' when those roads are just an element of the modern village. There is a repeated theme promoting assumed early settlement outlines as boundaries to be enforced into the future (to prevent development) when in fact these were breached long over three hundred years ago. There is little or no factual evidence of the assumed early boundary, and no trace at all of most of it.
37. Para 1.2.1. It may be argued that the plan isn't really 'the work of the community to which it relates' as the owners of 90% of the land area affected by it were not fully included in the process again not fitting with the Communications Strategy.
38. 1.2.2 I am wondering why this refers to 'developers' when surely it means anybody considering a planning application?
39. 1.2.3 Focussing on residents to the exclusion of a landowner who may live nearby as I do, and be regularly involved, seems unbalanced, perhaps the wording should be altered. I have noticed repeated expressions of opinion at parish council meetings dismissing non-resident stakeholders as less relevant than a resident. Such views are inappropriate and this wording should be addressed to correct the point. The parish council has a duty to champion the needs of everybody involved in the parish.

40. Para 1.4.4 ought also perhaps to include farmers, also important local businesses especially in the farming county of Norfolk. Omitting them perhaps shows the Plan is not tuned in to the local commercial environment and refers only to businesses within the village. The pc doesn't seem to relate to the farmers at all.
41. Para 1.5.4 suggests an enlightened outlook but it must remember these *statements* have less weight attached to them than the *policies* in the Plan, that are generally less opportunistic and facilitative of growth and future housing.
42. Para 1.6.5 might be viewed in the light of village growth, and perhaps there are probably no more or less species here than in many rural parishes, so the weight to be attached to this evaluation of this locality must be balanced against that. Biodiversity Net Gain accommodates wildlife anyway. New Buckenham is neither a museum nor a zoo or wildlife park.
43. Para 2.1.2 suggest the Parish Council might review the plan every five years. Section 4 at page 69 suggests steps for this including a 'Monitoring Officer'. This assumes perhaps unrealistically that the PC has the skills and knowledge and that a person can be found in five, ten and fifteen years' time, willing to take on and properly discharge this enormous task, (getting this far has taken five and half years already) The words read well but the reality is far less reassuring. Usually only a handful of Parish Councillors attend meetings so how they might deal with this large task is questionable. The 'get it going and alter later if needed' approach is therefore not persuasive.
44. Para 2.2.2 is an example of numerous statements in the Plan that seem to use the historic context rather too much from a museum perspective. I am wondering why the last sentence (as in many other places) excludes reference to the fact that the village has grown considerably since the original layout? The neighbouring and older parish of Carleton Rode (unlike New Buckenham, recorded in the Domesday Book) is said to have a very high number of Listed/ very old buildings in the country so New Buckenham may not be as unique as suggested. Again; Over 30% of the dwellings in New Buckenham parish are outside the assumed line or 'boundary' of the 'Moat'.
45. Para 2.2.6 once again refers to a 'Moat' as fact when researchers have found the alignment is at best 'assumed' and there is largely no trace of it. Figure 11 on page 19, shows a line of an entire 'Moat', but it is acknowledged by experts and researchers that line is 'assumed' and was being ignored and filled in by 1630 (Gosling). Several very old houses are on or outside the assumed route of it.
46. Para 2.2.8 states that 96% of respondents said that protecting village heritage is extremely important. Is this any great surprise?! Q. 10 in S.17 (which I was not allowed to complete) perhaps leads them to that conclusion?.

47. Figure 12 on page 20 is once again only part of the current built village, it outlines in red 'neighbourhood plan area' but the plan doesn't show that. Why is the whole village not shown here?.
48. Para 2.2.10 suggests the parish council having an early involvement in a planning matter but they are not qualified to do that. See para. 43 of my letter response to the first consultation. I have had personal experience of the PC even objecting (unsuccessfully) to a new agricultural barn - in Norfolk - a farming county! - because they felt it was too big for the related amount of acreage, grounds they were completely unqualified to assess.
49. Figure 13 on page 21 of the Plan shows various suggested 'Protected Views', apparently seeking to create currently non-existent perceived right to views over private land with no legal easement for that being in place and no discussion whatsoever with me as to marker No. 1 which is in my field, not publicly accessible, on my land. There is no right to a view. The 'view' is of fields and some 1960s chalet bungalows, and is not especially different from any rural countryside view, arguably less meritorious than some in fact. It is surely far beyond the powers of the Plan to imply/ impose any such rights? It is impossible to disconnect the placement of 'Protected View' marker no. 1 from the fact that in 2016 I applied to build some houses in a small corner of that field!
50. Further, a recent social media post shows a village resident complaining her view of the village church has been lost by some new houses opposite her house. For her that view is as cherished as any other village view, so surely *any* view is important to the extent that somebody enjoys it and this section of the Plan seeking to select six *specific* perceived 'views' is nonsense as it is an issue to be applied and considered *equally through the entirety of the Plan* area, either within the built environment of the village or outside of it. Why relax 'protected view' status in areas of the village that may be potential Garden Grabbing building plots! This section highlighting these six (or any) selected 'views' is pointless and should be removed from the Plan.
51. Policies LH1 and LH2, page 23 seem to me to be woolly and vague and too easily provide ammunition against development. '*....manner appropriate to their significance....*', '*.....demonstrate a positive impact....*'. '*....conserve or enhance the historic character....*'. What does this 'jargon' mean, what will it mean to a user of the Plan in ten or fifteen years' time?!, I am of the view that wording of this kind is simply nonsense and also, fails to comply with paragraph 042 of the guidance '*clear and unambiguous*' wording.
52. Policy LH3 is devoid of accurate connection with reality. I repeat, the built environment of New Buckenham village is already expanded by over 64 houses. I counted and scheduled them. If there are 209 households that means there are 30% of the houses already outside the alleged 'historic boundaries' ie. The assumed line of

the ditch or 'Moat'. This policy's foundations are at odds with the facts but it can be used to sabotage any new building outside the area mentioned. The policy is far too stringent, is based on historical beliefs and assumptions that are without real hard evidence, and should be removed.

53. Policy LH4 far too easily blocks development and once again seems to use woolly jargonesque wording; '*... enhance the special quality of the open countryside....*'. It once again refers to 'important views' but as I have pointed out, everybody may have their own opinion of views anywhere in and around the Plan area and this Plan should not be used as a vehicle to imply previously non existing rights over private land.
54. Community Action point CA LH 2 at para 2.2.10 is at odds with the proposed County Broadband scheme that would bring new cabling. A good broadband service is urgently needed. WFH has brought this into sharper focus than ever. Those who live close to the 'Green Cabinet' may enjoy a good signal even via the old copper cabling but for those further away the issue requires urgent attention.
55. 2.3.6 refers to the Common and ought to be corrected; only about half of it is SSSI. The 'South side' of the Common is not SSSI. The same error is noted at the top of page 30 implying the whole Common is SSSI. The section makes no reference to the grazing right owners and the historic grazing of cattle on the Common which is an equally important aspect of balancing the management of the Common by livestock depasturing it.
56. Para 2.3.7 may be accurate as to the presence of certain species following some observations, which were largely made by well-meaning local people but that does not mean these are not also to be found elsewhere if anybody were to take the time to look for them. This point is that the presence of these species (and therefore the implied unsuitability of this location for development) may not be as unique as the reader is led to believe. By contrast the wildlife report does not mention the presence of bats, or newts and nor do either of the two professionally conducted wildlife reports I have commissioned. The observations made about bats were conducted by amateur observers over an area much larger than the Plan area which could skew the claimed results.
57. Para 2.3.21 and plan at Figure 11 propose 'Green Corridors'. One of these is a route from St Mary's Chapel on Castle Hill Road heading around the castle ruins, and north to a 'T' junction (in the 'Half-Moon Meadow') with another shown left to right/ East-West. This route round the castle (known as the 'Drift' and perhaps best referred to in the Plan as that to encourage retention of historic names) is also the subject of a registered *Private Right of Way* from the public highway at Castle Hill Road to the land at the North, shaded pale green and outside the Plan. I agree some re-planting and rejuvenation of hedges on this route and improved hedge cutting techniques would be an advantage. (I recently planted around 400 metres of mixed hedge elsewhere in the parish). However, the proposed green corridor on this route should

not overlook the fact that is an access route '*at all times and for all purposes*' which may include large farm machinery or any other traffic, to the land at the North and with a view to avoiding future misunderstandings, the Green Corridor suggestion should not be taken as to imply any restriction or interference with these routes now or in the future. Perhaps some wording acknowledging the multiple uses of these routes generally, might be sensible.

58. I am encouraged by the reference to hedge planting and suggest the pc appoints a hedge planting co-ordinator, a role I will be glad to fulfil, irrespective of the future of this Plan.
59. Para 2.3.22 once again presents as fact that the settlement was surrounded by a 'Moat' but there is no hard evidence for it, it is *assumed* and was being filled in, abandoned and breached at least three and a half centuries ago. Only small parts actually exist.
60. Para 2.3.24 highlights the importance of gardens for wildlife but is at odds with the preference for building by infilling set out at para 2.5.2.
61. It would be perhaps be hard to envisage any other outcome to Q11 of S.17 than the one mentioned at 2.3.25 on page 34. The same can be said of para 2.3.26!
62. Although this revised version of the Plan has now mentioned BNG (Biodiversity Net Gain), omitted from the Draft, the connection has not been made with para 2.3.30 which overlooks BNG as a recognised way to accommodate and enhance wildlife rather than lose or deteriorate it. It is wrong to imply that development is unavoidably damaging to wildlife, a repeated theme of the Plan.
63. Noting once again that it is the *policies* not the *statements* that prevail as to how this Plan bites, Policy CE1 at page 34 once again takes on wording that could easily be used to prevent development; '*...makes a positive contribution to the existing green infrastructure....*'. What exactly does that mean and who would decide?! This policy is far negative to a planning application.
64. Policy CE2 can also be used as a barrier to development. It is far too easy to claim that a development may result in the loss or deterioration of habitat and it can be not very difficult to recruit alarmed objectors with claims of that sort however exaggerated. Assessments such as '*.....benefit outweighing harm....*' are vague and an easily moveable target.
65. Para 2.4.3 again mentions bats but there is nothing to say these might not be found elsewhere if anybody took the time to look. In fact the 'count' was conducted on an amateur basis and included observations on private land far outside the Plan area.
66. Policy DS1 at para 2.4.6 too easily scuppers a planning application, DS2 at para 2.4.7 ought also to be re-drafted '*.... Impact on wildlife, annoyance to local residents...'*. These far too easily cripple development. 2.4.9 and 2.4.10 seeking to determine how long lights stay on for. These guidelines enter the realms of excessive control.

67. Para 2.5.2 once more expresses the idea that the village has grown very little. This point is made again and again. There is an old settlement but it is remnants and fragments of that within what is now and has for a very long time been a bigger settlement. Seeking to prevent it growing will merely cram more housing into the centre, ‘Garden Grabbing’ and compromise the very thing this Plan seeks to protect. These repeated statements about a preserved ancient settlement which has not grown or only slightly so, are not accurate and it is a mistake to run this theme so heavily. The future health of the village is best protected as Professor O’Riordan spent a Saturday morning explaining to an audience of around 100 people, by ensuring provision for modern energy efficient housing and that means growth. Again; Over 30% of the present housing is already outside this alleged ancient assumed ‘boundary’.
68. Para 2.5.6 seeks to dismiss the Housing Needs Survey conducted by Breckland which found the need for five houses. It is a live and valid report. If 60% did not want more housing then 40% DID. A change in voting of only 10 out of 100 would have balanced this point evenly.
69. 2.5.7 Refers to ‘Affordable’ which has connotations with the NPPF, RSL’s and suchlike. My proposal for a **Community Land Trust** and my offer of a donation of land into it, addresses the issue in a more locally controlled way and in my view this plan and the PC should greet that offer with a far more positive response than that demonstrated by the remarks at para 2.5.12. Para 2.5.13 seems to me to express the view that there does not need to be new housing at New Buckenham as it is being built elsewhere so New Buckenham does not need to participate!. Perhaps the 40% of those surveyed, who were in favour of new houses being built, will be shocked to read that in this Plan? 2.5.14 once again overlooks the actual shape of the present built environment, which is certainly not rectangular. Describing the existing settlement as ‘almost squared off’ doesn’t seem at all accurate, overlooking some very old growth.
70. For this Plan to have succeeded in preventing development that might enlarge the built environment on grounds of preserving an ancient Moated settlement, or ‘preserving its original boundaries’ (if either could be definitely proven), it would have to have been put in place certainly before 1600, so if it seeks to run those as arguments against growth, as it does repeatedly, then it seems to me it is being written at last 400 years too late! The horse bolted centuries ago!
71. Para 2.5.12 deals with but appears to seek to downplay the possibility of a **Community Land Trust** and overlooks my offer of a donation of land into it. The Plan should leave this opportunity much more readily accessible during the long years of its lifespan (but not expect to the offer to continue indefinitely!).

72. 2.5.13 seems to imply that New Buckenham does not need to participate in providing housing as it is being built elsewhere. The village cannot just opt out of the national need for more housing. The same theme reads out from para 2.5.22 and 2.5.23; maybe these things are needed but put them somewhere else!
73. 2.5.17 seems once again to recite some grounds against new housing and growth. This theme runs repeatedly throughout the Plan. Once again Wildlife is mentioned as an obstacle to development. These factors can all be addressed and the Plan really does seem to overplay the negatives time and again. The '*...retention of the historic boundary....*' is a myth, again; over 30% (64 dwellings) of the current housing is already outside of it, including a number of houses several centuries old.
74. 2.5.20, as mentioned the parish council is attended by only a very few regular members and their overall capacity to opine on planning matters as proposed doesn't seem realistic.
75. Policy HB1 at para 2.5.25 seems to offer some warmth towards development but that is immediately chilled by the wording '*...subject to other policies in this plan....*' which are numerous in their ways to sabotage it.
76. Policy HB2 at para 2.5.27; what is meant by '*...respond to their setting in the light of the local heritage assets...*' and '*...and the surrounding landscape....*'?
77. Para 2.6.12 deals with car parks. I have offered land for a car park at the corner of Cuffers Lane in the past. Garden Grabbing by cramming more housing into the existing built environment, which the Plan states it prefers ('infilling') will only make matters worse and new development that might bring parking ought to be prioritised.
78. Policy BT2 at para 2.7.15 ties with para 2.7.8. Broadband for all is critical. Clearly those residing close to the green cabinet enjoy a better service than those remote from it for whom the matter is urgent especially in the light of WFH.
79. Policy RHC1; what is meant by '*.....development that enhances community life...*'?, in any event the policy can be trumped by others - '*...subject to other policies in the plan....*' is this sound drafting?, does it surely not lead to an argument about how much weight might be attached to which? This is another example of wording that seems to offer an open door but just as quickly closes it.
80. Policy RHC2 at para 2.8.12 seems to clearly have been written with some building in mind? What lead to the Policy being drafted? Do the parish council have any property in mind for future application if this policy?

Despite the opportunities I have taken to respond to the consultations, that means only being able to comment retrospectively. It would have been far more satisfactory and much better fitting the published 'Communications Strategy' if the parish council had set the very first task as establishing a list of everybody they needed to include, together, on

an open playing field; instead they rushed to conduct a survey (s.17) before compiling that list thus abandoning their own Strategic framework.

I have sometimes found it difficult to obtain prompt answers to various questions on procedure and repeat that having to search around and look for information is not the same as having it delivered to you.

Finally, I refer the inspector to the following;

- i. My correspondence with the parish council.
- ii. A letter from the Local MP asking the parish council various questions about its procedures on this project (which letter the PC did not publish or bring to public attention).
- iii. My research and mapping on village growth alongside the related independent professional report I commissioned on village growth.
- iv. My letter response to the first consultation from February 2020.
- v. A Newsletter I published in February 2021.
- vi. The full questions from the 2017 survey 'S.17' and by comparison, the letter sent to landowners later on.
- vii. Wantage Plan Inspector's report.
- viii. Working party 'Terms of Reference' and 'Communications Strategy' documents published on 30th October 2016, no longer on the webpage. (copies available).

I trust the inspector will take on board and reflect upon the points I have made.

Charles Stimpson

Ph. [REDACTED]