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15 July 2024

Planning Policy Team  
Breckland District Council  
Elizabeth House  
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Dear Sir or Madam,

**Rocklands' Response to the Breckland Local Plan Consultation – Regulation 18, Preferred Options**

Please find attached, Rocklands Parish Council's response to the above phase of the consultation – including Preferred Options.

We would be very grateful for confirmation of receipt.

Yours faithfully,

pp  (Clerk to Rocklands Parish Council)

David Howie  
Chairman, Rocklands Parish Council

cc Laura Waters – Planning Policy Manager  
Andrew D'Arcy – Principal Planning Policy Officer  
George Freeman MP

# Rocklands Parish Council

## Consultation Response

### Breckland Local Plan

### Regulation 18 – Preferred Options

#### Background

This phase of the consultation was discussed at the regular Parish Council meeting on 1 July, 2024. A public meeting was subsequently held in Rocklands Village Hall on 6 July, 2024 – where a presentation was delivered by RPC to outline the results of the previous consultation on Development Options, and to outline and discuss the questions and current consultation on the Preferred Options. 77 persons attended.

#### General Comments

- The sheer size of the consultation document itself is such that it presents a formidable and largely unapproachable barrier to a typical Breckland resident wishing to understand it, never mind respond to it.
- As responses are invited from Breckland residents, the lack of a glossary of terms is a significant omission.
- The nature of much of the document appears to be more of a PR publication for specialised audiences, than one to be understood by members of the public. There is hard, factual information in there – but it has to be extracted from a plethora of aspirational statements and general PR. Is this Regulation 18 document intended to be for HMPI consumption rather than public consumption?

There is a lot of text attempting to be policy, but it is not. Rather, there is a lot of aspirational and *flowery* text – which is subjective and open to interpretation. A lot of *should's*, instead of *must's* and *will's*. Such things cannot be associated with measured performance in e.g. KPIs.

- The document contains a number of errors – some already brought to the attention of the LPA, and others listed in our following comments and answers. Disappointing lack of cross-checking and quality control.
- For example, the chapter and page references for each question in the '*Preferred Options Report survey*' on the website do not correctly match those in the index of the draft report, and the report itself.
- Requiring simply binary answers (YES/NO) to eight of the nine questions asked, grossly over simplifies the issues involved. Yes, supporting explanations are requested, but accurate responses can only be far more detailed and subtle. At least, an alternative 'PARTLY' could have been offered. Any attempt to analyse numbers of YES/NO answers and then present a summary will carry next to no value.

#### Chapter 2 – 'A Spatial Portrait for Breckland'

- Para 2.6 states "75.7% of the working age population are in employment, compared to 77.8% across the East of England and an average of 75.8% Great Britain." It then goes on to say that "Unemployment in the District is very low..". It is difficult to understand, when the District employment rate is 0.1% lower than the National rate, and 2.1% lower than the East of England, that the latter statement is valid.

#### Question 1 - Do you agree with the vision for Breckland see Chapter 3 (page 19)? – 'Breckland's Spatial Vision and Objectives'

Answer – **NO**

- Para 3.2 states “*It is the Council's aim that the vision for Breckland should:.... reflecting the aspirations of local communities..*” and, Para 3.7, p.22, ‘*Development in the Right Place*’ (1.) “*..reflecting the aspirations of local communities..*” However, the principle that has been adopted (*HOU 02: Distribution of housing development*) imposes housing allocations on Market Towns, Local Service Centres and Secondary Villages – whether a local need has been expressed by the community, or not.

This principle appears to be based on the misguided perception of spreading the housing requirement amongst villages, just to give them their ‘*fair share*’ – whether there is a genuine local need or not.

Turning small villages such as Rocklands into commuter villages, does little to improve benefits to the community – and certainly does not carry positive environmental outcomes - contrary to the aspiration set out in para 3.6 “*Reduce the District's carbon footprint and enable residents to take action themselves.*”. Contemporary experience shows that commuting almost invariably involves personal motor transport – leading to negative environmental outcomes. Also, that use of rural shops, pubs etc. often does not benefit the community as much as imagined – motor travel to other locations for recreational and retail purposes can be significant.

- Para 3.5 (1.) – ‘*Inspiring Communities*’, “*Enabling everyone to lead happy, healthy, and fulfilling lives.*” Imposing housing allocations on small rural communities, where there is no local need, is hardly going to lead to a “*..happy..*” outcome. Such communities are almost invariably receptive to development where appropriate to local needs, and readily support it – and they are certainly not *nimbys*.
- Para 3.7 (6.) – ‘*Meeting Housing Need*’, “*..a variety of decent housing types..*” High quality housing must be the objective at all times – *decent* is an ambiguous term, and implies acceptance of sub-standard design/construction. No reference to community design guides in Neighbourhood Plans etc.
- Para 3.7 (14.) – ‘*A Rich Environment*’, “*Promote... high-quality design minimising the impacts of development..*” A laudable ambition – but completely ignored in, for example, the ‘*Bowsfield*’ development in Great Ellingham. This development is completely counter to the expressed ambition.
- Para 3.7 (17.) – ‘*Thriving Communities*’, “*..supporting locally accessible, high-quality healthcare..*” How is this to be done? Even if additional e.g. doctors’ surgeries were constructed (and developers appear to be able to wriggle out of any contribution), where would the staff come from – the NHS is in crisis. For example, as a result of the explosion in housing in Attleborough, Attleborough Surgeries appears to be seriously under-resourced; waiting several weeks for just a telephone consultation is wholly unacceptable.
- Para 3.7 (19.) – ‘*Thriving Communities*’, “*.. make sure decisions are made at community level as far as possible..*” This is clearly not the case with the housing numbers which have been allocated without consulting communities.

Question 2 - Do you agree with the general development principles in Chapter 4 (page 26)? – ‘*Sustainable development principles*’

Answer – **NO**

- Acceptable “*walking distance*” to services and public transport is not defined. There was a ‘*Breckland Local Service Centre Topic Paper*’ in May 2015, which concluded “*..the acceptable walking distance for the majority of people is 800m with a preferred maximum of 1200m. Beyond that distance people will use other forms of transport.*” It appears that, throughout the proposed Local Plan, the “*..preferred maximum..*” has been used (for convenience?).
- Para 4.5 – ‘*General Site Development and Design Principles*’, “*.. particularly the needs of younger households and those on lower wage.*” This is entirely unnecessary, and should not be selectively emphasised; “*.. instead meet the needs of all generations..*” sufficiently covers the point – “*..and financial circumstances.*” possibly added. Not all of the text here can be considered as valid policy.
- Para 4.12 – ‘*Accessibility*’, “*.. should be located within easy reach of a range of services (via walking, cycling and public transport).*” This should be reworded to say “*..safe easy reach..*”. Some of the

'Preferred' Phase 2 Site Allocations, would require residents to walk significant distances along roads with no pavements, blind bends, and sometimes across busy main road junctions.

- Para 4.17 – '*Flood Risk*'. This section is ridiculously brief and insubstantial. Whilst HOU 02 recognises that certain settlements have particular concerns with flooding, this paragraph entirely ignores the issues that can arise from the nominal policy that the LLFA only be consulted when a development involves 10 or more properties. Recent local experience has shown that fewer than 10 properties, built on previously water meadow land, with inadequate water management arrangements – has led to an exacerbation of already significant surface water flooding in the area.

Also, a Parish Council representative has recently taken part in an on-line meeting with consultants – retained by the LPA - to review the Strategic Flood Risk Assessment (SFRA) which supports the Local Plan. This paragraph makes no reference at all to the SFRA, its importance, or how it should integrate with the Local Plan. It should refer out to Para 8.107, where the SFRA and flooding are addressed.

- Paras 4.25 and 4.29 – '*Criteria Based Policy*' effectively dismiss Settlement Boundaries - which is wholly unacceptable.

In fact, the Issues and Options Consultation Feedback Report (13.05.2024) states (p.19, para 2.56) "**A total of 184 responses were made to the corresponding question (Q.15), Do you think that the Local Plan should continue to define settlement boundaries or rely on a criteria-based policy? 53% of respondents indicated that they agreed with retaining settlement boundaries as they provided certainty, with some agreeing that a criteria-based policy should also be incorporated.**"

and

Para 2.57 of that same report "**Respondents who indicated 'no' (21%) to settlements boundaries mostly expressed the requirement for a criteria-based policy approach. It should be noted that 27% of responses to this question indicated they were "unsure".**

So, with **53%** wanting to **retain** Settlement Boundaries, and **21% not**, why on earth have the LPA completely ignored the wishes of the (very significant) majority and imposed a criteria-based approach?! One wonders, why consult at all?

- Paras 4.29 and 4.30 attempt to justify ignoring the wishes of the majority, and continuing to adopt a criteria-based approach – but contain vague and insubstantial wording.
- Notwithstanding the above, Para 4.29 states "*Neighbourhood Plan updates could if desired implement local Settlement Boundaries informed by the strategy and criteria for growth established in the Local Plan.*"

When asked whether a Neighbourhood Plan could influence the 'Built Form' of a settlement, the Principal Planning Policy Officer advised:

*" Neighbourhood Plans can add local detail to the Local Plan but not reduce the proposed levels of development. A settlement boundary could for example be used to clarify the extent of the built up area as set out in the Local Plan but would need to ensure that any new allocations were not excluded and that the Local Plan policies could still be applied.*

*Any proposed boundary would be subject to consultation and examination."*

So, it appears that Local Plan Policies – which include housing allocations – must still be able to be applied. Also, the concept of 'Built Form' (built-up area?) (GEN 03) is poorly defined – see response to Q.3.

- On discussing aspects of the criteria-based approach with the Principal Planning Policy Officer, the '*criteria*' in question appear to be policies GEN 01–GEN 04, and the 'HOU' policies.

Much of these policies tend to be far too generic and open to interpretation. The *interpretation* will, ultimately, be made by the LPA – with little basis on which neighbourhoods and communities will be able to challenge.

Question 3 - Please share your views on the proposed strategy for housing and the issues that need to be considered for proposed sites to achieve sustainable growth - Chapter 5 (page 40)? – ‘Housing’

Answer – **NO**

- Para 5.23 – (3.) ‘*The settlement hierarchy*’, “*Employment*”. We pointed-out, in our response to the previous phase of consultation, that counting an employee who may only work for one hour per day with a particular employer – as a full-time employee – was erroneous, and could give rise to double-counting (and higher). The LPA response appeared to be that, to be any more accurate, was an unfeasible exercise as the source of data did not differentiate. This is not an acceptable metric, and is somewhat lazy.
- Para 5.35 – SDP 01: ‘*Strategic Development Policy Option - Barkers Farm Larling*’, (a.) “*Establishes a deliverable integrated access and transportation strategy...*” and (b.) “*Provides for safe walking and cycling routes to Harling Railway Station...An enhanced railway service for Harling Road should be explored with the operators and Network Rail..*” Regarding a walking route, Harling railway station – by existing routes - is 2,650 m from the proposed site, and 2,120 m directly; over 2.2 and 1.7 times the 1,200 m *preferred* walking distance (see answer to Q.2) criteria (*questionably*) used for Local Service Centres. Regarding train operators and Network Rail, this can only be a wish – as the LPA will have little influence over the bodies concerned.
- Whilst Policy GEN 03 introduces the concept of ‘*Built Form*’, and a number of policies (e.g. HOU 06, HOU 09, HOU 10, HOU 13) use the term ‘*settlements*’ or ‘*adjacent to settlements*’, whether these terms are one and the same is wholly unclear. Crucially, ‘*Built Form*’ is inadequately defined, ambiguous and open to interpretation. A far clearer, more robust, definition is essential. Any policies currently using these terms are therefore significantly flawed. Paras 5.59 and 5.60 are therefore similarly flawed.
- HOU 04: Preferred housing allocations – ROC 1 (065) and ROC 2 (064). Whilst the Parish Council are not comfortable with any of the ‘*preferred*’ or ‘*alternative*’ sites listed – they have significant issues such as extremely narrow single-track roads, safe access, flooding, distance to village facilities, no sewer capacity etc. – the two listed in HOU 04 are the only ones adjacent to the current Settlement Boundary (‘*Built Form*’? – not at all clear..). More details in ‘*Preferred Sites*’ feedback.
- HOU 24, Paras 5.67 and 5.159-5.168 ‘*Affordable Housing...*’ Whilst the HEDNA Final Report (May 2024 – but headed on each page ‘*August 2023*’??) identifies that 90% of affordable homes need to be ‘*Social and affordable rent*’, no attempt appears to have been made to identify what proportion of those need to be social rented i.e. the most affordable part of the market (important in the cost of living crisis).
- Para 5.75 - “*Affordable housing is secured through s106 agreements that secure the commitment to delivery of affordable housing...*” How are the LPA going to secure this? Countless times, developers return to Planning Committee – after having secured permission – claiming that the provision of affordable housing is now uneconomic, and that they wish to build smaller numbers or none at all – and the LPA allow such applications..!

Question 4 - Do you agree with the approach to employment and the economy in chapter 6 (page 121)? - ‘*Employment and economic development*’

Answer - **No comments on this question**

Question 5 - Do you agree with the approach to retail and town centres in chapter 7 (page 143)? - ‘*Retail and Commercial Development*’

Answer – **One observation**

- Pages 150-152 - The legends forming part of the Town Centre maps are overlapped and obscured. Therefore, it is impossible to understand the meanings of the four coloured lines/outlines.

Question 6 - Do you agree with the approach to the environment, climate change and managing resources in chapter 8 (page 158)? - 'The Environment, Climate Change and Managing Resources'

Answer – **Not Entirely**

- ENV 01: Climate Responsive Design – the Council has declared (Para 8.1) a Climate Emergency in the District. Therefore the policy must be explicit and robust – all 'should' must be replaced with 'must'.
- Para 8.16 - 'The Environment', refers to Local Nature Reserves (LNR). 'County Wildlife Sites' are also important, should be mentioned and protected from development. Rocklands has one such site on Low Lane.
- ENV 10: Development in Nutrient Sensitive Areas. It is entirely wrong to limit restrictions on development in nutrient sensitive zones to just the River Wensum SAC and the Broads SAC. There are a number of other similar zones e.g. Sites of Special Scientific Interest (SSSI's), Special Areas of Conservation (SAC's) and rivers and streams supporting a myriad of wildlife. Rocklands Parish has one such area, Swangey Fen – which is a SSSI and part of the Norfolk Valley Fens Special Area of Conservation (SAC), a European designated site – and the adjacent River Thet.
- Para 8.108 discusses the requirement for flood management and mitigation measures to be demonstrated by prospective developers. This paragraph entirely ignores the issues that can arise from the nominal policy that the LLFA only be consulted when a development involves 10 or more properties. Recent local experience has shown that fewer than 10 properties, built on previously water meadow land, with inadequate water management arrangements – has led to an exacerbation of already significant surface water flooding in the area.

Rocklands, with others, is listed in HOU 02 as a settlement having particular concerns around flooding. The LLFA must be consulted on any planning application for those areas prone to flooding. In any case of uncertainty, the Parish Council must be consulted.

Question 7 - Do you agree with the approach to the design and development in chapter 9 (page 209)? - 'Design Quality and Principles'

Answer – **NO**

- Far, far too many *should's* in this chapter. Good design and development principles/requirements must deliver a good degree of certainty. Replace most *should's* with *must's*.
- Para 9.3 - The text states that there are six design priorities – then goes on to list seven... Number 1. and number 7. are the same.  
No reference is made to local community design guides which have been adopted by the Council, or are incorporated in Neighbourhood plans.
- Para 9.5 "Development which has inclusive engagement processes" emphasises the importance of developers engaging early on with the local community and the Council, so that the nature/design of proposed development aligns with the communities' aspirations/ambitions. However the phrase "Developers should engage with the local community..." is weak and ineffectual. Replace 'should' with 'must'. There must be a tick-box on the planning application form to indicate that this has been done.
- Para 9.6 "... hedgerows which not only provide ideal habitats for biodiversity but can also integrate a new building into the landscape. Roadside hedgerows also provide effective amenity privacy and screening for residents." So why has the awful Bowsfield development at Great Ellingham been allowed to develop with houses facing directly onto Hingham Road – where the original mature hedging has been torn down?
- The Bowsfield development, Great Ellingham, fails to comply with so many of the proposed design and development policies.
- Para 9.7 – **Safe** "...walking and cycling should be prioritised.." Too many of the preferred site allocations will involve pedestrians having to walk more than 800 m\* to local shops/facilities on narrow rural roads with no pavements. (\* see answer to Q.2).



- DES 01: Development that complements and enhance its context. The exception for small scale development has no justification at all. All development must consider the local context and at least complement, if not enhance, it.
- DES 02: Pre-application engagement and advice. “ *Applicants should engage with communities and the Council.*” Applicants must engage with communities and the Council. To specify major applications etc. is to miss smaller/less significant developments which can still have a major impact on the context and character of an area.
- DES 04: Encouraging active travel and mitigating the impact of vehicles. Again, safe walking and cycling routes should be emphasised.
- **Heat pumps** are referred-to in Paras 5.140, 5.141 and DES 05. Whilst the previous Government, somewhat lazily, latched-on to this form of energy-saving (*ticking boxes*), the fact is that even the best designs can generate significant noise. A development where all properties employ such equipment, has the potential to generate ambient noise levels to an extent where residents can suffer, as can existing neighbouring properties and wildlife. Rigorous attention to design and positioning must be emphasised in design and development policies – and checked-for.

Of course, ground source heat pumps – where viable – create no such noise issues.

Question 8 - Do you agree with the approach to community in chapter 10 (page 217)?

- ‘Community’

Answer – **YES**

- COM 01: Healthy Lifestyles. “*New development in Breckland...refer to the Breckland Design Guide in creating healthy places to live which are:... e. Protected from environmental **houses** such as noise, ground and water contamination, flood risk, vibration, and poor indoor and outdoor air quality.*” Environmental *houses*..? Is this intended to refer to environmental hazards..?

Regarding noise, see also the comments re heat pumps in answers to the previous question.

- Para 10.18 - ‘Community facilities’ – “ *For the purposes of this policy community facilities are defined as:..*” The list does not mention **Post Offices**. They provide a vital, essential community service and these days offer a much greater range of services than they used to. Certainly, many are located within other businesses, such as shops – but not always...

Question 9 - Do you agree with the approach to infrastructure in chapter 11 (page 228)?

- ‘Resilient and adaptable infrastructure’

Answer – **Not Entirely**

- Para 11.12 – The term “*..perceptions of safety..*” is used to describe the reticence that walkers and cyclists have to navigating the district’s roads, resulting in them choosing to make journeys by car. Although individuals’ perceptions may vary greatly, on the whole, safety concerns are justified – with rural roads being narrow, with blind bends and used by buses, increasingly large agricultural vehicles, and ridiculously large (for the routes) haulage vehicles.
- Para 11.15 - seeks to “*..steer development towards areas of low flood risk, Flood Zone 1.*” However, this zoning system only applies to river or sea flooding. In certain parts of Breckland, depending on groundwater levels and topography, surface water flooding can cause serious damage to homes and property. This is recognised, to an extent, in Para 11.16. The new SFRA must include data down to settlement level – as local communities know better than anyone else of local conditions and history. Rocklands has provided information, and raised such matters, with the consultants retained to review the existing 2017 SFRA.

A central file must be kept for each community at significant risk of flooding, and referred-to for every planning application in the settlement. A list of settlements so-affected should be kept – and some of

these are listed at the end of policy HOU 02. Efforts must be made to ensure that this list is kept up to date.

- Para 11.17 – Too often, the permeation tests carried out by developers/consultants for the purposes of SUDS and other drainage systems, are carried out at *favourable* times of the year and do not appear to be challenged. In some cases, most often Autumn/Winter time – when groundwater levels are considerably higher – such drainage systems fail, causing serious issues for both residents of the new development, and for neighbours. Permeation tests must be mandated at a time of year when groundwater levels are most challenging.

This paragraph also refers to the LPA seeking advice from the LLFA “..for new major development.” Hitherto, there has been an arbitrary ‘10 dwellings or more’ trigger point to mandate such a consultation. Depending on the topography/conditions pertaining, serious consequences can result from developments smaller than 10 dwellings. The central files/SFRA should indicate when the LLFA must be consulted, irrespective of development size.

- Para 11.19 – “Where necessary the Council will seek to impose Grampian conditions to ensure that appropriate upgrades are completed to the sewerage network in advance of new development taking place.” Effectively, the development cannot start until a sewerage network – already at maximum design capacity – has been upgraded to deal with the additional load.

Currently, under s.106 of the Water Industry Act 1991 there is an ‘absolute right’ for a developer to connect a to a public sewer and the sewerage undertaker has no right to object or to refuse on the basis of lack of capacity of the sewer. This absurd situation was finally recognised as such during the previous Government, and steps were being taken to have this *right* removed from the Act. Until this has been expedited, the LPA must impose Grampian conditions where there is a likelihood of harm being caused by sewage discharges from a proposed development, and this must be a material consideration.

- Paras 11.24-11.28 deal with ‘Solar Photovoltaic Farm Planning Considerations’. Whilst policy is in favour of permitting such developments, “..if their impacts are (or can be made) acceptable.”, there is no reference to the *elephant in the room* – connection to the grid. Although not within their control, the Council must recognise this and have some aspect of policy which deals with the likelihood of a new solar farm sitting dormant for many years before it can be connected. This can have consequences – such as loss of potential crop yields.
- Paras 11.29-11.30 deal with ‘Anaerobic Digestion Planning Considerations’.

11.29 states “ Anaerobic Digestion proposals are regarded as waste treatment facilities, where feedstock is classified as waste under relevant legislation..”. This is misleading, as a significant proportion is maize – grown specifically to feed the facilities.

11.30 refers, only fleetingly, to “..traffic impacts”. These impacts can be considerable – numbers of very large agricultural tractors/trailers travelling often narrow rural roads to/from the AD plant. Sometimes at *unsociable* times (11pm, 12pm etc.), causing noise and physical shaking to roadside properties. Planning conditions must impose operating periods only within which transport activities are permitted. It has been said that contractors can seek to obtain special permission from LPAs to operate outside conditioned time windows – this must not be permitted under any circumstances. They are not operating critical services.

Incidental to the above, the LPA must acknowledge that it does not make sense, in energy terms, to grow maize or wheat as feedstocks. The energy value produced is approximately a tenth of the calorific value of maize to a human being. There are also issues with the high levels of nitrogen fertiliser used on the maize crop, the low water retention capacity of maize land – giving rise to significantly increased surface water flooding, and the significant CO<sub>2</sub> (and other) emissions from large scale transport activities.



## Development In Local Service Centres: Rocklands

### **General**

As stated in our previous consultation response, Rocklands Parish Council are not comfortable with any of the sites put forward as a result of the Call for Sites exercise – they all have significant issues. As previously, we do recognise that the two preferred sites below are adjacent to the current Settlement Boundary.

We urge the council to take advice from NCC Highways and Anglian Water at the earliest opportunity.

In reviewing the Phase 2 Site Assessments ('Preferred', 'Alternative' and 'Discounted'), it is somewhat puzzling that, for every site assessment, under 'Settlement Hierarchy:' Rocklands has been categorised as a "Secondary village". Yet, due to the flawed (*in our opinion*) manner in which employment numbers have been calculated (*see our answer to Question 3*), we have been re-designated (*without consultation*) as a "Local Service Centre". These two designations are therefore seriously conflicted.

In the Phase 2 Site Assessments, the "preferred" walking distance of 1,200m has been used (*see first answer to Question 2*). This, in spite of the conclusion "... the acceptable walking distance for the majority of people is 800m..". Somewhat convenient?

We are puzzled by the Phase 2 Site Assessment for Magna Farm (LPR/C4S/DEV/251). We made representations about this site in the previous consultation – but they have not been included.

### **PROPOSAL ROC 1: The Street (LPRC4SDEV065)**

Our comments in response to the previous 'Winter 2023/2024' phase stand.

These include site prone to surface water flooding, narrow roads, very limited visibility on egress from the proposed site, access along roads which have no pavements, loss of visual landscape amenity by existing residents.

### **PROPOSAL ROC 2: South Of Bell Road (LPRC4SDEV064)**

Our comments in response to the previous 'Winter 2023/2024' phase stand.

These include – very narrow road with no passing places, high banks, blind bends, access along roads which have no pavements, visual landscape impact.

Additionally, the capacity of the first-time sewer completed in Autumn 2023 to serve Rockland St Peter, is fully accounted-for. This was re-iterated several times by Anglian Water at a number of public meetings held in the Village Hall. It's design capacity is only to serve the properties which are already there.

Ground water levels in Autumn/Winter periods at the proposed site are such that other foul water disposal systems e.g. package treatment plants, will not function at that time of year. Bell Road floods at the proposed location.

### Overall

- Too many of the policies are subjective and open to interpretation. This makes it very difficult for local community representatives e.g. Parish Councils to rationalise and interpret or challenge.
- As the LPA are the final arbiter, and many of the policies are subjective and sometimes not clear at all – often with qualifiers – the ability of community representatives to challenge is significantly weakened.
- In respect of Neighbourhood Plans, the overall effect of this proposed Local Plan would appear to be to significantly weaken them. Whether there are communities in the process of developing a NP, or reviewing/updating an existing one – this exercise is extremely labour-intensive, and can be costly. If the Local Plan is indistinct, it will be difficult to align a NP with the LP.
- Some communities may already be questioning whether it is worth the time/effort/expense to continue developing/maintaining a Neighbourhood Plan...