

# **ROUDHAM & LARLING PARISH COUNCIL**

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## **Suggested response to Public Consultation on Main Modifications to the Breckland Local Plan.**

### **1. History of development of Local Plan**

Breckland Council has been working on a new Local Plan (which will run for 25 years from its adoption, so hopefully 2011-2026) since 2013 at least, and there have been a number of consultation-type documents/events:

- 1.1. Initial Call for Sites (2013);
- 1.2. Issues and Options consultation (closed 9 January 2015);
- 1.3. Preferred Directions (Regulation 18) consultation (closed 22 February 2016);
- 1.4. Developers Forum Local Plan Viability event (29 February 2016);
- 1.5. Plan Wide Viability Study consultation (closed 18 March 2016);
- 1.6. Preferred Site Options and Settlement Boundaries consultations (closed 31 October 2016), which was accompanied by a series of Local Plan Working Group meetings around the district;
- 1.7. This led up to the Pre-submission Publication consultation, which invited views as to the 'soundness' of the draft Local Plan, i.e. whether it was consistent with national policy, and set out an appropriate strategy to meet the housing, employment and infrastructure requirements of the district. As well as being available online, copies of the various documents were also available for inspection at venues throughout the district, including the Council's main offices in Thetford and Dereham, and in Customer Service Centres and local libraries in the market towns;
- 1.8. On 30 November 2017, the Local Plan was submitted to the Planning Inspector (Jonathan Manning) appointed by the Secretary of State to carry out an independent examination;
- 1.9. Breckland Local Plan Examination Hearing sessions were held by the Inspector between 17 April 2018 and 20 September 2018;
- 1.10. The Inspector has produced these "Main modifications" which need to be subjected to yet another consultation period. Basically, Breckland has no choice but to accept the Inspector's modifications, as if they do not the Inspector will conclude that the Plan is not "sound" and will not pass it, meaning that Breckland cannot adopt it, and therefore Breckland will have to remain using the existing Plan, which as we know, is largely deemed to be "out of date" and can, therefore, be set aside.

### **2. Main Modifications consultation**

- 2.1. Comment on this consultation is restricted to the changes (modifications) being made by the Inspector. It is not possible to comment on any other matters.
- 2.2. In total there must be many '000s of modifications. Many arise because the plan is based on various statistics, and during the long life of the construction of the Plan, updated versions of these statistics have been published, meaning that the Plan needs amending so that it is based on the latest figures. Many more are very minor or grammatical changes. These seem to include that Breckland had consistently referred

to the “Local Plan” and it seems that in many (but not all) cases the Inspector has chosen to change this to “Development Plan”. Breckland had also chosen to refer to “Rural Settlements” with Boundaries, whereas the Inspector prefers to call these “Villages”. I would not suggest making any comment on these minor, nit-picking (or jobs-worth) modifications.

- 2.3. The final document, with all modifications, amounts to 320 pages! I admit that I have not read all (or probably even most) of it thoroughly (and I doubt whether there are many people who actually have!). So I have concentrated on those modifications to policies which would have most impact on the Parish and its neighbours.
- 2.4. It should be noted that the Local/Development Plan is about development, and not about preventing development. However, it is clear that Breckland had been keen to ensure that the right sort of development took place in the right places, by introducing wording into its policies which would allow the wrong kind in the wrong place to be refused, and so that the Planning Inspectorate would not be able to overturn those decisions on appeal. It is apparent that the Inspector has decided to prevent that by making modifications to many policies in order to make it more difficult for Breckland to refuse planning permission in general.

### **3. Policy GEN 05 Settlement Boundaries**

Norfolk in general is a county of small villages, and perhaps Breckland is even more so. Settlement boundaries (or the absence of them) and the development of smaller hamlets will have a larger impact on the nature of the district than in many other districts. In this policy, “Outside the defined settlement boundaries, development is restricted to preserve the countryside” has been changed to “Outside the defined settlement boundaries, development is restricted to recognise the intrinsic character and beauty of the countryside.” There is a big difference between “preserve” and “recognise”.

### **4. Policy HOU 03 Development Outside of the Boundaries of Local Service Centres (e.g. Harling)**

This had four criteria which need to be satisfied. Criteria 2 as proposed by Breckland has had two words added: “It would not lead to the number of dwellings in the settlement significantly exceeding the identified housing target.” The inclusion of the word “significantly” will lead to countless arguments and appeals, and, as one parish after another is allowed an increasing excess over the target, and used as a precedent, effectively removed any limit at all outside the boundary.

### **5. Policy HOU 04 Villages with Boundaries (e.g. Hockham)**

This had five criteria which needed to be satisfied. In criterion 1 the word “minor” has been deleted from “It is minor development ...”, and criterion 3, “Development provides a significant community benefit” has been deleted in its entirety (not just the word “significant”. Clearly in the Inspector’s mind, development is not about benefiting communities, but just about meeting Government targets.

### **6. Policy HOU 05 Small Villages and Hamlets Outside of Settlement Boundaries (e.g. Roudham. Larling does not qualify as a village and is not mentioned in the document)**

This also had five criteria which needed to be satisfied. In criterion 2 refers to “minor development” and “of up to 3 units” has been deleted, leaving only “appropriate scale and designs to the settlement”, and criterion that there should be “appropriate support by the parish council” has been deleted in its entirety. Breckland wanted the views of the parish council to be more actively considered than those of a non-elected group or individual. OK, parish councils are not statutory consultees, but I do not feel that what Breckland had said implied that they had any kind of veto. Rather, as the elected representatives closest to the

residents, it seems entirely appropriate that the views of the council should carry marginally more weight than those of others. (Consider, in contrast, the position of the Inspector. Who elected him?)

## **7. Harling**

Harling is defined in Policy GEN 03 as a Local Service Centre, the third level in the Settlement Hierarchy. Policy HOU 02 - Level and Location of Growth sets a total growth (from April 2011 to 2036) of 250 (up from the previous figure of 242), which represents a 10% increase. 145 of these have already been committed, so the target is only 85 more. This is planned to be at a 5.3 hectare site off Kenninghall Road. There is, of course, no mention of the recent application to build on land next to the cemetery.

## **8. Roudham Industrial Estate**

8.1. The Industrial estate not classified as a General Employment Area, and is barely mentioned in the document. It is referred to in the section on Harling where it says “there is significant employment at Roudham (less than 2km from East Harling)” and under “Employment Development Outside of General Employment Areas” where it says “A number of employment sites are provided for in the rural areas away from settlements, including Shipdham Airfield (Cranworth), Snetterton and Roudham and available land within these areas should be investigated in the first instance.” It therefore comes under Policy EC 04 - Employment Development Outside General Employment Areas.

8.2. This says that proposals for employment will be permitted (a) where no other suitable sites are available on identified employment sites, and (b) there are particular reasons for the development not being located on an established or allocated employment site (e.g. expansion of an existing business, businesses based on agriculture/forestry/or other industry where there are sustainability advantages to being located in close proximity to the market they serve), and the development “would not adversely affect the type and volume of traffic generated”. The Inspector has not made any changes to this section of the Policy.

## **9. Conclusion**

9.1. I recommend that the Council considers objecting to these modifications to the plan, notwithstanding the fact that it will almost definitely make no difference whatsoever.

9.2. The emerging Plan has been through a process lasting some 6 years, in which the views of the electorate have been sought at various points. Had the Inspector made the changes because these views had been gathered and the ignored, that might be acceptable, and even supported. But it seems that the aim of these (and other) modifications is simply to make Breckland support the development of more dwellings, regardless of where the development takes place and regardless of the views of local people and representatives. It is almost as if the Inspector has been set a personal target to increase the number of new dwellings to be developed. Although the target for developments outside development boundaries remains at zero, every extra development will be one more to the overall national target.

**Julian Gibson**  
**Clerk**  
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