

Our Neighbourhood Plan, probably like many others, started with a focus on housing allocations and even now that aspect may be its most contentious.

But during the plan's preparation we've gradually come to understand that a criteria-based approach is more appropriate, focusing on the area's key development constraints. In theory we would consider dropping all mention of housing allocation numbers, but in practice our experience has meant we feel the need to retain an allocation (in our case we set a range) because:

- It gives certainty to villagers who have less understanding of what a criteria based approach means;
- We lack trust in the planning system to robustly implement policies that are purely criteria based since:
 - The NPPF conflicts with the main principles of Localism by its presumption in favour of so-called sustainable developments, which in practice need almost no justification in order to be deemed sustainable (e.g. the usual proposition we see in planning applications that services in Watton automatically make developments in Saham Toney sustainable);
 - The use of the 5 year land supply rule as an inappropriate and illogically applied loophole. To us it is clearly wrong to say that because development in other parts of Breckland, that are higher in the settlement hierarchy with larger housing allocations, does not satisfy the 5 year supply, new housing in Saham Toney that's non-compliant with the neighbourhood and local plan policies should/must be approved, or that those policies must be given less weight. **A NEW APPROACH IS NEEDED FROM THE GOVERNMENT ON THIS THAT PROPERLY REFLECTS LAND SUPPLY NEEDS IN SPECIFIC LOCATIONS RATHER THAN JUST AT DISTRICT LEVEL.**
 - The new 3 year supply rule doesn't help much since it is (a) very short term; and (b) in order to apply a major assessment of site allocations is required that is expensive, time-consuming and readily subject to challenge, since it can never address every nuance of development.
- Even if we accept that Government is committed to neighbourhood planning - not always easy to do given the NPPF / Localism conflict that can make neighbourhood planning look like a confidence trick there just to give communities a false illusion of having a say - then it seems the principles and strategy are being diluted as they pass down to district level, and then again from Councillors to planning officers, who seem to have little interest in passing their control to communities and little trust in communities applying that control in a fair and effective way.
- Our experience is that implementation of policies by planners is inconsistent and lacks rigour. **We do not consider today's planning system is fit for purpose** since it appears to result in deliberately vague planning policies, subject to individual and arbitrary interpretation and easily worked around by developers. As just one example a site in Saham Toney that was deemed undeliverable by Breckland Council in studies both in 2011 and 2014 has since been given planning permission although its circumstances haven't changed at all, other than for the worse given the flood event of June 2016.

Our other main challenge has been the repeated delay of the Local Plan and its perceived weakness. The consequences of this for our plan have been a need to revise it to reflect ongoing changes to the local plan, a weakening of certain aspects as the local plan seems to have been gradually watered down, and the great probability of a severe delay to our own final submission while we wait for the local plan to be adopted. We can only guess at the reasons for Breckland's delay, but can't help but

attribute it in part to inefficiency and inertia, perhaps pressure from vested interests and the problems of lack of resource and outsourcing of planning functions. There seems to be no incentive for Breckland to complete its plan, little visible pressure from the Government for it to do so, and no consequence to Breckland Council as a result of its failure in this respect.

From the start we have sought to prepare a rigorous Neighbourhood Plan and the challenges faced have simply strengthened our resolve in that regard. Our plan makes much more use of wording such as "shall" and "shall not" than others we have seen, certainly than any others in Breckland, which we feel have either suffered as a result of a more interpretative approach, and/or been diluted by consultants and BC. Our approach has been endorsed by a consultant highly respected in the planning profession who is one of few with no conflicting connections to developers. To gain still more credence we are commissioning an examiner "health check" of the plan and its thirteen volumes of evidence in parallel with the Regulation 14 consultation. In a nutshell we feel that by allowing sufficient opportunity for a limited amount of development consistent with the key constraints (but greater than that implied by the Local Plan) we are entitled to be prescriptive about development in areas that are not appropriate.

As a result what we're hoping for most of all is support to maintain and achieve a plan that is water-tight and help to ensure we don't encounter the same problems as faced by other Breckland villages to date. We'd like to discuss what form that help and support might take in the immediate and short term future, such that we will have no complaints or issues to raise when we reach the final submission stage. Additionally if anything can be suggested to allow us to proceed to final submission in advance of local plan approval but with little or no risk of significant change to our policies that would allow us to maintain our momentum and proceed with more confidence as independently as possible to the local plan (still recognising the need to broadly conform to it).

We would also value ongoing help to publicise our plan and fully engage villagers with it.

As a last thought, another area we think the Government should consider addressing is funding of neighbourhood plans. It seems wrong to us that a district Council receives more than twice the funding that a parish council receives although it is the latter that undertakes the vast majority of the work.

We are also keen to hear how the recent parliamentary debate on village plans has been followed up, and of course any other insights, information and suggestions you may have.

We have rather moved away from the idea of a forum of the 17 villages to agree housing allocations, and think a better idea might be a forum of all groups in the constituency (and perhaps the neighbouring ones as well where there is overlap between parliamentary and district boundaries) that have either completed a neighbourhood plan, are in the process of preparing one, or are perhaps simply considering the idea. We think this might be a very useful and proactive vehicle for pooling ideas, experiences and lessons learned to the benefit of all, and which would be particularly powerful if it had your sponsorship and occasional participation.