

## SLIDE 1

Development in Saham Toney dates back at least 6,000 years.

## SLIDE 2

There have always been constraints on growth which has thus happened at a gradual pace. We recognised from an early stage, in order to be effective, our Plan must address today's principal constraints, which in no particular order, are:

- a) The availability of services and facilities;
- b) Local housing need;
- c) Highways;
- d) The local landscape character's sensitivity to development; and
- e) Flood risk.

In doing that, the Plan aims to cater for growth, while respecting and mitigating each of the constraints, which is surely a key principle of sustainability.

## SLIDE 3

In preparing the Plan, we adopted a well-balanced approach, weighted neither towards growth nor to the local environment, and which is thus socially, as well as economically and environmentally sustainable. Hence, we do not think it reasonable to 'cherry pick' policies in a way that will significantly tip the balance towards growth. Likewise, we don't think aspects of the NPPF should be cherry-picked to support a particular case, but should like the Plan, be taken as a whole.

At the heart of neighbourhood planning is the principle that it should be used by local communities to address local issues, that higher level plans have neither the scope nor the knowledge base to tackle. That is what our Plan does. From the outset we decided it could not fulfil its purpose if it simply tackled issues in a superficial and ambiguous way, and instead, it must provide the necessary detail for all parties to gain a common understanding of development requirements in Saham Toney.

## SLIDE 4

We have fully embraced development by allocating 70 houses on 9 sites, more than double the minimum target for Saham Toney, while leaving flexibility for other development to come forward.

During plan preparation, as we increased our focus on growth, likewise we gave more attention to adequately mitigating constraints to growth. By commissioning a series of professional studies and assessments, we confirmed our intuitive understanding of the constraints, and our policies evolved to address them in a way aimed at maintaining the Plan's sustainability balance.

A call for sites resulted in potential for 222 dwellings on 16 sites and a further 59 were the subject of 2 undecided planning applications at the time. From that starting point, the level of growth set out by the Plan was determined by an objective, analytical and exhaustive process of site assessment and selection. That avoided any preconceptions. In practice all sites had constraints. In some cases, those were mitigated by applying specific policy criteria and where necessary by adjusting site boundaries and/or capacities. For others, the constraints could not be adequately mitigated and those sites were not allocated.

It is unreasonable and unjustified to propose that our site allocation process, which no consultee opposed at any stage, now be largely disregarded, by:

- a) Deleting or diluting policy criteria applied to mitigate development constraints;

- b) By redefining maximum housing numbers for which ample evidence has been provided, as minimum numbers which may be exceeded contrary to the sustainability evidence, and
- c) By increasing site densities.

Neither is it appropriate to remove some of the Plan's important protections for the local environment, particularly those relating to infrastructure and flood risk. In combination with allowing a greater level of development, that would deliver a double whammy to sustainability.

To ensure sustainability and certainty, aspects of the Plan are prescriptive, but we have justified that with clear, detailed and persuasive evidence. Our policies provide certainty by reflecting the evidence in an unambiguous, comprehensive and robust way.

## SLIDE 5

The evidence base for the Plan is extensive, and in most cases professionally prepared, and its main elements are worth highlighting:

- Site assessment, site selection and masterplanning reports justify not only why 70 dwellings are allocated, but also why greater numbers are not.
- Strategic Environmental and Habitats Regulations assessments show that the Plan's policies have an overall positive impact on the environment and protect habitats of special importance, and so help confirm the Plan is in balance.
- The Landscape Character Assessment defines the sensitivity of various areas to development and in doing so, supports and guides the site selection process, as well as any future development decisions.
- The transport study shows that site allocation to the extent defined will not have an adverse impact on the local highway network, and that all allocated sites can be safely accessed.
- The flood risk study demonstrates that the issue is well-covered by the surface water management policies.
- The housing needs assessment establishes specific local needs and demonstrates that housing tenure requirements differ from those of the district as a whole.

Other than minor points on our environmental reports, and some helpful advice on how to make our design guide more village-specific, none of the evidence base has attracted adverse comment during 4 rounds of formal consultation.

Taken together, the evidence base paints a clear picture of how growth in Saham may take place in a sustainable way, and that's what underpins our policies. That, coupled with community support and landowner confirmations of their sites' availability, gives us confidence the Plan promotes an acceptable level of sustainable and deliverable growth.

We accept that a plan must offer flexibility, and that is built into our Plan. But flexibility is not best ensured by ambiguity. Certainty benefits all involved in the planning process, and is far more likely to reduce costs and delays, than add to them. The use of terms such as 'must' and 'will' as opposed to 'should' are an inherent part of providing certainty, but we have applied them in ways that ensure adequate, but not unlimited flexibility.

If the Plan's robustness set out to hinder development, our case for its level of certainty would be weaker; but that is not the case. Through site allocations alone, the Plan delivers more new houses than the minimums specified for 4 of the 18 local service centres in the Local Plan – those being a higher tier in the Breckland settlement hierarchy. That being the case, there is no justification for rewording the Plan to allow an unspecified additional number of new dwellings. Conversely, we see every justification for robust policy criteria to mitigate the constraints I mentioned earlier.

## SLIDE 6

We will be happy to discuss in detail any of the constraints and how they have influenced policies, but in the limited time I have remaining, I'd like to focus on those relating to drainage. We listened carefully to the local community on all aspects of the Plan, but it was most passionate and vociferous on the topic of flood risk. Many households are not simply concerned about that, but utterly fearful of it, and understandably so, given that about 1 in 7 are at direct risk and many have suffered 2, 3 or more flood events in the last 5 years alone. We heard phrases along the lines of "not a single new house should be built until flood risk is stopped" many times. We understand the Plan cannot take such a stance, but will not willingly 'hang villagers out to dry' on this topic as one person observed would be the case if the Plan failed to protect against flood risk in a rigorous way. The plan would fail in its duty if it did not provide rigorous policy safeguards.

## SLIDE 7

The neighbourhood plan is in essence a contract with the local community and the development industry, to be administered by the Local Planning Authority. As with most contracts, it will be in use for many years, in this case 15. Over that period, its detailed wording will be scrutinised and any areas of doubt or vagueness will be used by various parties to the planning process to suit their own purpose. Just as the Plan balances growth with preservation of the local environment, so too must this contract maintain a good balance between the parties to the planning process; so that developers can provide the right number and type of homes in the right places, while present and future villagers continue to enjoy all there is to value about life in Saham Toney. Amending the plan to tip the balance in either direction will render the contract unfulfillable.