

BAWDESWELL PARISH COUNCIL FORMAL RESPONSE TO THE BRECKLAND LOCAL PLAN REGULATION 19 CONSULTATION

Introduction

While Bawdeswell Parish Council (BPC) is appreciative of the opportunity to comment once again upon the latest draft Breckland Local Plan, prior to the Planning Inspector's examination of the document, it would first like to register its concern that, with some exceptions (such as the eventual downgrading of Bawdeswell from a Local Service Centre to a Primary Village), it is apparent that Breckland Planning Staffs (contrary to informal views made by staff at earlier 'Town Hall' gatherings) have failed to take any or adequate account of BPC's objections to the sort of unsustainable development being considered for Bawdeswell. Indeed, until a recently strongly worded BPC complaint prior to the recent Breckland Cabinet meeting which approved the draft Plan, the planning staffs have failed to respond at all to BPC's formal submissions and arguments against such developments. This is not local 'democracy' as we would like to know it!

It is also questionable if the Breckland Cabinet was fully aware of the strength of Bawdeswell's opposition to the latest draft plan prior to its approval on 19th July. From BPC's perspective, therefore, it is vital that this formal BPC commentary be shown to the Planning Inspector prior to his/her consideration of the draft Plan, and that BPC is represented in person at any public hearing that the Planning Inspector may initiate in consideration of the draft Breckland Plan.

With this in mind, BPC, in this commentary on this latest draft Local Plan, will re-iterate its significant concerns yet again; albeit on this occasion, the submission will also be copied to the Leader of Breckland Council, local district councillors for the Upper Wensum Ward and the local MP, George Freeman, to ensure that the BPC message is well known before the draft Local Plan is considered further.

Background

Within the last, and still extant, Breckland Local Plan, Bawdeswell has already faced a new 40-house development (Bluebell Rise), plus other in-fill developments, without any significant improvements in infrastructure and sustainability within the village. On the contrary, Bawdeswell has lost a number of its vital amenities (pub, post office etc) and employment opportunities, rather than experiencing any increase in sustainability courtesy of this major housing development. This fact runs counter to, and makes a mockery of, the supposed planning philosophy that housing development brings with it infrastructure developments and sustainability – it doesn't!

Prior to the latest iteration of the new draft Local Plan, and central government's significant (50%) increase in housing development sought for the region, Breckland's plans included the development of some 65 new houses in 3 potential sites around the village, one of which

was considered unsuitable because of significant road safety concerns. However, BPC, in accepting that development within the village was inevitable, and to be welcomed if it was sustainable, advocated some development on the Foxley Road site and the other smaller area (Site 123) opposite the end of The Street, adjacent to the Norwich/Reepham Road.

However, with the subsequent downgrading of Bawdeswell from a so-called Local Service Centre to a Primary Village, primarily (one assumes) because of the eventual recognition by Breckland of the lack of sustainable infrastructure in the village, there was an expectation within the village that the housing target allocated to Bawdeswell would be reduced; albeit recognising that this reduction would be counter-balanced to some extent by the central government edict of an extra 50% housing target for Breckland. Given the conflicting requirements of central government edicts and the downgrading of Bawdeswell to a Primary Village, the BPC therefore expected that the village housing target was perhaps likely to stay about the same (maybe 65 houses). The BPC therefore concluded that, with some associated infrastructure improvements, this might be sustainable. Accordingly, the BPC recommended some 45 houses on the south-eastern area of Site 161 (which had previously been briefed to the BPC by a local developer) and a further 20 houses plus retail units (also briefed to the BPC by a local developer) on Site 123.

The Current Breckland Draft Plan for Bawdeswell

Bearing in mind the above, the BPC was amazed and seriously concerned to find in the latest, and seemingly last, iteration of the draft Local Plan, that Bawdeswell had been 'allocated' one major development of 120 houses on the north-eastern side of Foxley Road from Tilney Farm to the layby adjacent to the A1067 (BAWD 1 (161)). No mention was made, or apparently considered, of utilising the other Site 123, even though this potential development was close to the centre of the village, included the prospect of infrastructure improvements, and could have been achieved earlier within the new Plan.

The Foxley Road proposal does specify a mix of housing and some limited "supporting infrastructure improvements and facilities"; albeit without specifying in any detail what these should be. Apart from the obvious issues surrounding access points and road safety considerations down the adjacent Foxley Road, there is little evidence to suggest the need for any significant improvement in "facilities" to support sustainability in the village. This approach runs counter to the theme of so-called 'sustainability' running throughout the draft Plan, but which, in fact, seems to pay 'lip-service' to a policy which is outside Breckland's control, and which, in practice, is largely ignored.

On a point of detail, the document specifies required extensions to the 30mph speed restriction along the northern edge of the site, but there is no road there, and any on-site inspection of the area would have revealed that there are already 20 and 30 mph limits along Foxley Road (the 20-mph limit has recently been extended along part of Foxley Road to encompass the Primary School area). Somewhat surprisingly, the Breckland draft also

argues for the maintenance of “the rural character” and “long views” in and around the Bawdeswell Conservation Area. With this in mind, it is difficult to imagine any positive impact of 120 new houses which would actually be outside of the Bawdeswell Conservation Area! Such poorly considered stipulations do not fill one with confidence as to the thoroughness of the Breckland appraisal!

BPC Objections

Apart from the general and considerable consternation that Breckland planning staffs had seemingly failed to take any account of BPC’s observations and recommendations and had, instead, simply imposed a 120-house target on site 161, BPC’s basic objection concerns the very significant adverse impact of a 30% increase in housing stock (400 to 520 houses) on the nature, ambience and sustainability of a community like Bawdeswell. The BPC was also dismayed to find that, with the exception of a few strategic policy platitudes, the latest draft Plan agreed by the Breckland Cabinet largely continues to ignore the infrastructure needs for sustainable development; even to the extent of ignoring the possible development of a smaller, more central village site where a commitment to some infrastructure improvement was possible!

In very brief terms, the proposed 120-house planning target for site 161 is completely out of proportion for a Primary Village of Bawdeswell’s proportion and limited facilities. Moreover, while it is recognised that previous settlement boundaries are now apparently defunct in Breckland’s planning philosophy, it should be recognised that the site in question is well outside the heart of the village. The ribboning effect of such a development would adversely impact upon the nature and cohesiveness of the village, and would, in effect, subsume the settlement of Foxley into Bawdeswell, to the detriment of its own character. The development would also lose valuable agricultural land which, with solar farms etc being developed close by, raises the serious question of agricultural sustainability in the current cost of living crisis.

The next nearest Primary Village to Bawdeswell, North Elmham, originally had an 80-house planning target (now extended to 105 houses). This is not only far less than Bawdeswell; but when one takes account of the facilities within North Elmham (2 pubs, shops, school, post office, doctor’s surgery, public transport to the local market town etc) compared to the limited facilities in Bawdeswell (no pub, part time post office, no public transport to local doctors or Dereham and very limited local employment), one has to question the logic in Breckland’s argument to impose a much higher target on Bawdeswell without even considering essential infrastructure improvements. Moreover, while the local primary school in Bawdeswell would probably welcome some more students to swell its classroom sizes and facilities, the education authority comments on the earlier draft suggested that it could not cope with a major housing development and would, therefore, probably have to transport our local children elsewhere for their education! In light of the disparity in support

facilities between these 2 villages, one has to question if Bawdeswell should even be a Primary Village?

Breckland planning staffs have very recently tried to counter BPC's concerns by suggesting that the 120-house target was fair statistically, given Bawdeswell's apparent capacity for further development and its history in previous plans of having less development than some other parishes. This is not only nonsense, but the argument runs counter to the Breckland philosophy that this is a new plan and no account should be taken of development under the previous plan. Moreover, this statistical analysis is not only 'suspect', it favours a simple 'tick-box' approach to meeting the imposed housing targets from central government without much, if any regard for the impact of such housing targets of the cohesion, viability and sustainability of our communities; or, indeed, the local viewpoint!

Summary

In summary, BPC is totally opposed to the proposed 120-house development in Site 161 on the grounds that it is disproportionate for a village the size of Bawdeswell, which has recently been downgraded from a Local Service Centre to a Primary Village because of a lack of suitable infrastructure to sustain its current housing stock; never mind a housing development of the size and location envisaged. Such a development would seriously undermine the cohesiveness of the village and, alongside its ribboning effect, would in effect subsume the settlement of Foxley into Bawdeswell. Except for some 'lip-service' within a few strategic policies, no practical regard has been given to the essential infrastructure improvements (public transport to local market towns and doctor's and dentist's surgeries, a proper post office, pub, shops and more local employment opportunities) needed in Bawdeswell to sustain the current housing stock, never mind an envisaged 30% increase!

All that said, Bawdeswell and its BPC recognises the inevitable; that some expansion will be necessary. Indeed, it would welcome some measured development, limited in size, as long as this is, more importantly, accompanied by essential infrastructure development for longer-term sustainability. That is why BPC made the recommendations it did in its earlier submission; a target in the order of 65 house alongside infrastructure developments on the south-eastern section of site 161 and the area opposite the end of the Street, Site 123.

It is perhaps time that the Breckland Planning Staffs started to engage fully with local representatives with local knowledge, rather than simply trying to reach imposed housing targets without thought to the local consequences. Bawdeswell is where we live and work, and frankly the local residents know best!

Finally, it is understood that the final draft Breckland Local Plan has embraced within it a 20.4% excess housing development target to cater for any 'failures' in the proposed developments or further consideration of the Plan. While not being aware of the regulations stipulating the required level of excess targets, this does seem high to say the least? The BPC

therefore argues strongly for a reduction in this excess target, primarily by reducing the illogical and potentially catastrophic 120-house target on Site 161 within Bawdeswell!