

Additional information – Consultation Statement feedback.

Consultation Statement

The Statement, responding to feedback from interested parties, contains no substantive changes to the NP or SEA.

Evidence to support this comment includes:

4.6.3 Issues raised and changes to the Plan

Statutory Consultees raised 30 comments. 20 resulted in “enhanced wording in support of an existing policy”, but no change to its nature. 4 comments were “noted”. One Policy was “removed as irrelevant” (flooding), 3 VC policies were combined. 4 recommendations were not accepted.

Landowners raised 7 comments: 3 were “noted”, 4 “rejected” and no changes to Plan outcome resulted.

Resident feedback, grouped into 17 themes: 3 themes were “not accepted”, 12 resulted in “enhanced wording to existing Policies” to justify the original outcome. 1 theme, “correction of factual errors”, was accepted. 1 change (Heritage impact from Green to Red) did not change the conclusion.

5.8.1 Sustainability Appraisal Scoping Report

Natural England: 6 points resulted in 6 enhancements to Policies, but no change (to be fair, no substantive issue raised).

Historic England: Feedback resulted in 1 item “noted”, 2 “additions of detail” and 1 statement of intent to “*reflect the significance of heritage assets to the village*”. No link provided to show where this was addressed. No change in Policy direction as a result.

OCC: 3 points of feedback, just “Noted”.

Environment Agency: 2 comments, one “noted”, 1 resulting in text amendment.

School Governors concern, just “Noted”.

10 Residents comments, at 30 pages (p63 – 93): 53 points “noted”, 24 “enhancements to wording in existing policies” (where there was also statutory consultee feedback), 26 “no action”, 1 commitment to include statement on light pollution.

5.8.2 Pre-submission Consultation Neighbourhood Plan and Sustainability Appraisal Report

This section extracts submissions from Thirkettle and another (name redacted) over pages 95 to 103. The Response rejects 13 points, notes 3 points, enhances existing policy 2 points. There is no substantive re-assessment of Policies in light of feedback.

Section: Comment Themes from Residents and Responses, P108 – 118.

Covers 17 main topics (and later 5 “other” topics). The Report records “no follow up action” for 3 themes, 12 defensive statements to “*clearly communicate...preferred strategy,*” 1 change of TSA outcome from Green to Red (with no change of outcome as a result) and 1 acknowledgment of correction of factual errors.

The Consultation Statement appears to defend against feedback, not embrace it.

Further examples of lack of engagement include:

Stakeholder involvement

The NP Roadmap states that “*anyone in close proximity to a development is a stakeholder*”.

- There was no formal engagement with residents directly opposite the Site. The Minutes of the NPSG, 09/09/16, state the school and pre-school were to be contacted to give feedback to the Rectory Homes presentation. No contact proposed with stakeholders around Six Acres.
- 20/10/16 email received stating that the developer would only work via NPSG. Oct 2016 informal meetings with villagers supportive of the NPSG took place, as the NPSG Communications Officer indicated that the Committee was too busy to meet formally with those impacted. The NPSG did not subsequently engage with residents.
- Attempts to raise issues were met with aggressive responses. Multiple email examples (e.g. email 09/12/16). Debate on village email discouraged (e.g. emails from NPSG Feb 2016, further emails e.g. 03/04/17). NPSG Chair wrote on 17/05/17 stating that the Committee “*is not encouraged to enter into private communications with individuals*”.
- The majority of decisions, including Site selection, were made by the NPSG and presented as outcomes to the village. Despite comments that the NPSG did not have sufficient resources, (e.g. emails on 22/06/16), no volunteers surrounding the site were sought. Attempts to join were ignored. Attempt to join the PC was voted down.

Partial data points used to support outcome

Once momentum for a Site existed, communication focused on getting support for the outcome. Examples of partial information include:

- NPSG Minutes December 2015 discussed site selection. January 16 Minutes refer to “main site selection criteria”. This is well before the results of the community questionnaire.
- Challenges to the interpretation of village questionnaire to support a Site selection attracted aggressive feedback (e.g. email from Dr Rod Graham and responses from NPSG – available in documentation at SODC)
- Multiple examples of failure to provide explanation of terms or detail of Planning Policies (e.g. email 18/04/18 from Chair of NPSG to village)

- Regular statements to villagers that SODC policy for infill required 100% redundancy (requests for evidence of the statement not provided, not in SODC or NPPF).
- Frequent comparisons with Benson and other large villages, without clarifying different planning conditions applicable.
- Suggestion that W&S would be re-classified as a large village, requiring more houses (e.g. email to village 16/07/16 and 26/08/16 also suggesting the NPSG would resign if not supported, resulting in unfettered development and implying this would be on a scale relative to large villages).
- 23/11/16 Use of ballot to suggest 90% of villagers supported policy H2 (26% of village attended a meeting and 90% voted against developer led planning).
- Unproven dependency on re-designating Footpath 7 to allow access to the Green from north of the development.

Lack of transparency - information from third parties

Multiple requests to share source data from CFO, the written recommendation from the PC which identified "*no material planning considerations*" to object to development on Six Acres, independent reports referred to but not published (email 09/12/16), copies of the Aecom Report on Sustainability and documents relating to landowner negotiations have never been provided by the NPSG. Early refusals to publish data resulted in a FOI request from Parishioners.

Consultation Statement P114 states "*having taken advice from CFO and independent Planning Consultants there are no policies in the Neighbourhood Plan which are not consistent with SODC Emerging Local plan. This is consistent with the feedback from SODC.*" Again, there is no source material, reference to SODC source, or the Planning Consultant's Report published. The Emerging Local Plan appears to contradict many of the criteria for Policy H2.

A fuller transcript of all the topics above, with all supporting emails, is available at SODC Site.