

Summary of Comments made by Andrea Pelegram Ltd

During the meeting on June 10, 2026, consultants Lee and Nick from Andrea Pelegram provided a comprehensive strategic framework for the Burford Neighbourhood Plan. Their advice was rooted in years of experience at both the local and strategic levels, including Lee's history as a councillor and planning director. Their primary message was that for a neighborhood plan to be successful at examination and effective in planning decisions, it must transition from a list of community "grumpiness" into a **legally robust, evidence-based document**.

The Strategic Vision and Policy Focus

Lee and Nick advised the steering group to establish a **positive vision for Burford**, typically aligned with the end-date of the emerging local plan, such as **2043**. They emphasized that while the community may oppose certain district-level housing allocations, the neighborhood plan itself cannot be a "vehicle for opposition". Instead, it must be "positively prepared" to pass examination.

A critical piece of their advice involved the distinction between planning policies and "non-planning routes." They noted that many community concerns—particularly regarding **traffic and HGV routing**—cannot be fully addressed through planning policy alone. They suggested including a separate section in the plan that points toward **partnership working** with relevant authorities for these issues, ensuring that community priorities are documented even if they fall outside the strict remit of planning law.

Evidence Over Sentiment

The consultants warned that early neighborhood plans often failed because they turned community concerns directly into policies without factual support. To carry weight in a planning decision, a policy must be **supported by facts and objective evidence**.

On technical matters such as **infrastructure, sewage, and flooding**, the consultants were blunt: neighborhood groups are often not viewed as "competent bodies" by authorities like the lead local flood authority. However, they provided a strategic workaround. Rather than trying to provide scientific data, the community should **document real-life events**. They suggested that a "picture tells a thousand words," and a log of documented flooding incidents or sewage failures can force technical authorities to reconsider their assessments. This is particularly important because smaller developments are often assumed to "increment on the existing system" without developers being forced to fund major infrastructure upgrades.

Protecting Against Speculative Development

A major portion of the discussion centred on how Burford can protect itself from **speculative development**. The consultants explained the **"tilted balance"** in national policy (NPPF): if a district lacks a five-year housing supply, more weight is given to the benefits of housing even if there are environmental impacts.

To counter this, they highlighted a specific protection: if a neighbourhood plan **allocates sites** to meet its local housing requirement (identified as 120 houses for Burford), it gains **special**

protections for five years against speculative development, regardless of the district-wide housing supply situation.

However, they cautioned that site allocation is a "double-edged sword". It requires:

- A formal **"call for sites" methodology**.
- An objective **site assessment** using a traffic-light system (Green/Yellow/Red).
- Additional public consultation that can be **divisive for the community**.
- An extra **six to eight months** added to the plan's timeline.

Because of these complexities, they suggested it might be faster to focus initially on **"cunningly written" policies** that establish an **"umbrella of protections"** for sensitive areas before pursuing site allocations in a later review.

The Regulatory Process and "The Snake"

The consultants mapped out the legal steps from **Regulation 14** (pre-submission consultation) to **Regulation 18** (referendum). They described the **Consultation Statement** as a "comfort blanket" for the independent examiner. This document must log every single comment received, show that nothing was overlooked, and provide a clear response for why a policy was or was not changed.

They also introduced the **Basic Condition Statement**, which proves the plan meets legal requirements and aligns with national policy. A vital warning was issued regarding late changes: if the group introduces a significant new policy *after* the Regulation 14 consultation has finished, they may have to "go back down the snake" and **restart the entire consultation process**.

Consultation Tactics and Community Engagement

Lee and Nick advised the group to be proactive in reaching "different voices". They noted that survey results are often skewed toward retirees, leading to an over-emphasis on health facilities and a lack of input on recreation or leisure. They recommended going directly into **schools, businesses, and mother-and-toddler groups** to ensure a rounded evidence base. For Burford specifically, they noted that the heavy commercial presence means the **Chamber of Trade and local businesses** must be central to the consultation.

Final Mantra: "Less Haste, More Speed"

The overarching advice from the consultants was to avoid the "cautionary tale" of councils that rushed their plans to meet grant deadlines, only to have them fail because they missed consulting businesses or forgot to include proper dates on paperwork. They urged the steering group to **"not confuse activity with progress"** and to ensure every step is done thoroughly to save time in the long run. They also noted that the **NPPF is changing** to a more rigid policy-based format, and Burford must ensure its policies are precise enough to withstand challenges from "challenging developers" and their barristers