

Justification for the proposed amendment to Attleborough SUE boundary

The Council have proposed to modify the boundary of the allocation for Attleborough SUE to align with the boundary of the outline planning application (3PL/2017/0996/O). The boundary amendment is considered necessary because it provides an accurate visual representation of the extent of the Strategic Urban Extension as allocated by Policy GEN 04.

The plan has been formulated in conformity with the NPPF (2012) which sets out in para 157:

‘Crucially Local Plans should:

- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development, where appropriate;’

In line with the NPPF, the boundary of the SUE represents a single site allocation to which the form, scale, access and quantum of development is set out in Policy GEN 04. The supporting text, vision and policy for the Attleborough SUE describe a comprehensive development. The strategy has been positively prepared as the Council has commissioned evidence to support the development of 4,000 homes in Attleborough on a single site which has informed the infrastructure needs, costs and delivery mechanisms to deliver 2,650 of these homes within the plan period. The preferred strategy for a comprehensive development has been subject to consultation. Whilst the current boundary contains parcels of land under different ownerships, it was always intended and communicated to the public that this would be delivered as a single development site. Policy GEN 04 is considered justified against other alternatives presented in the Sustainability Appraisal over the development of the Local Plan which included other directions of growth for a Strategic Urban Extension or the development of smaller sites in place of a large scale extension.

In addition, the NPPF states that Plans should be deliverable (para 173). The Council has sought to demonstrate that the comprehensive development proposal for Attleborough SUE is deliverable and effective, which in part is contingent on the basis that no smaller sites are allocated through the Local Plan. Additional smaller residential sites will immediately take up some spare capacity in the existing infrastructure network and impact on market value. The impact of smaller sites being delivered at different timescales within the SUE boundary has not been assessed and therefore it is imperative that the final boundary reflects the extent of the site which forms the comprehensive development proposal.

As a procedural matter the Policies Map is not a development plan document and not in itself subject to examination but illustrates geographically the application of policies in the plan. As such, the Inspector cannot recommend modifications to the Policies Map and it is for the Local Planning Authority LPAs to update to ensure consistency with the adopted plan¹. Therefore, the Council seek to clarify as part of the Examination process the boundary of the SUE to which Policy GEN 04 applies, and to seek the following modifications to the Pre-submission plan:

¹ The Planning Inspectorate - Procedural Practice in the Examination of Local Plans June 2016 (4th Edition v.1) Main Modifications to the Plan, Para 5.24, pg 28

- add a further map of the Attleborough SUE allocation boundary following policy GEN 04 in the Local Plan;
- Amend the map which depicts the SUE boundary (Attleborough Employment Allocation 1) which is already subject to a proposed minor modification (MIN/EC/AE1/A) to remove the Attleborough SUE and link road as this is not necessary to illustrate the proposed employment allocation, consistent with the other maps depicting employment allocations in the plan;
- The Attleborough Neighbourhood Plan Map depicts the SUE boundary in Map 2.1 and it is labelled as 'Preferred Growth Location (SUE) in Local Plan'. It is not intended to amend the adopted Neighbourhood Plan map or to remove it as a useful illustration of the Neighbourhood Plan policies in the Local Plan supporting text. However, upon adoption of the Local Plan the boundary of the Attleborough SUE in the Policies Map for the Neighbourhood Plan will be superseded by the Local Plan.