

## Comments

### Main Modifications to the Local Plan (18/02/19 to 01/04/19)

Comment by	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
Comment ID	40
Response Date	25/03/19 13:11
Consultation Point	Policy ENV 01 Green Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1

MM11 6 Where appropriate, the Council will seek to secure through planning obligations provision for the future management and/or maintenance of green infrastructure.

Do you consider the proposed modification is:  
(please mark the appropriate box)

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to? . Is it effective?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

The policy to include seeking developer maintenance contributions is supported, but there needs to be consistency in wording for all the elements of maintenance. This is particularly relevant to delivery and maintenance of the multi-purpose Attleborough Linear Park.

As currently worded, this policy is unlikely to be effective and is not consistent.

Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.

There should be consistency, so a need to cross reference to Policy ENV 04 and INF 02 for developer contributions to maintenance of GI.

### How would you like to be notified?

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	39
<b>Response Date</b>	25/03/19 13:04
<b>Consultation Point</b>	5.13 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM11 4 Supporting text Green Infrastructure

Supports the addition to the supporting text for Green Infrastructure that “development proposals should also be informed by the made Neighbourhood Plans”.

**Do you consider the proposed modification is:**     .     Sound?  
(please mark the appropriate box)

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

### How would you like to be notified?

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	38
<b>Response Date</b>	25/03/19 13:01
<b>Consultation Point</b>	Policy TR 02 Transport Requirements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM11 3 Support to additional texts

Do you consider the proposed modification is:  Sound?  
(please mark the appropriate box)

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?

How would you like to be notified?

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Comment by	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
Comment ID	37
Response Date	25/03/19 12:39
Consultation Point	Policy HOU 14 - Affordable Housing Exceptions ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1

MM31 Policy HOU14 e.

The scheme demonstrates good design, instead refer to COM 01.

**Policy HOU 14 e.** - for consistency the design policy COM 01 should be referred to instead of the text here, to avoid confusion of having two design policies.

Do you consider the proposed modification is:  
(please mark the appropriate box)

If you consider the proposed Main Modification  Is it positively prepared?  
to be UNSOUND, please identify which test of soundness your representation relates to?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

Not sound to have many design policies overlapping. Refer instead to

**Policy HOU 14 e.** - for consistency the design policy COM 01 should be referred to instead of the explanatory text here, to avoid confusion of having two design policies.

Not effective

We suggest all policy using design is cross-referenced to the design policy COM 01 for consistency with national policy

## How would you like to be notified?

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	36
<b>Response Date</b>	25/03/19 12:36
<b>Consultation Point</b>	Policy HOU 10 - Technical Design Standards for New Homes ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM26

Non-domestic buildings should as a minimum reach 'Good' BREEAM status is a non-housing point so should not be in a Housing Policy.

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?** . Is it justified?

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?**

Not sound

**Policy HOU 10** refers in design standards to “non domestic buildings water efficiency” in a housing policy.

**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

Suggest policy only refers to domestic buildings water efficiency

## How would you like to be notified?

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	35
<b>Response Date</b>	25/03/19 12:09

<b>Consultation Point</b>	GEN 4 - Development Requirements of Attleborough Strategic Urban Extension (SUE) Development Requirements of Attleborough Strategic Urban Extension (SUE) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM7

The revised wording in Policy GEN 04 Development Requirements of Attleborough Strategic Urban Extension (referred to as SUE) is supported.

The alterations to the figures for the Attleborough section and the revised paragraphs are supported.

The revised map Figure to make the SUE conform to the outline planning permission is supported.

**Do you consider the proposed modification is:**       Sound?  
(please mark the appropriate box)

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

**How would you like to be notified?**

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	34
<b>Response Date</b>	25/03/19 12:03
<b>Consultation Point</b>	GEN 2 Promoting High Quality Design ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM5 17 respect or

The ATC supports this policy and whilst we appreciate the insertion of the wording 'respect or' to acknowledge there are situations where design cannot enhance the quality of the environment, this should not be allowed to imply that a poorer design solution is acceptable.

**Do you consider the proposed modification is:**       Sound?  
**(please mark the appropriate box)**

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

**How would you like to be notified?**

## Comments

### Main Modifications to the Local Plan (18/02/19 to 01/04/19)

Comment by	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
Comment ID	32
Response Date	25/03/19 11:40
Consultation Point	1.43 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM3

The Attleborough Town Council welcomes clarity that “non-designated heritage” will be included in the strategic objective 12.

**Do you consider the proposed modification is:**            Sound?  
(please mark the appropriate box)

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

**How would you like to be notified?**

## Comments

### Main Modifications to the Local Plan (18/02/19 to 01/04/19)

Comment by	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
Comment ID	49
Response Date	25/03/19 14:02
Consultation Point	Policy COM 01 - Design ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

In some cases the Council will request the involvement of a developer funded Design Review, subject to viability.

The supporting text does not refer to viability.

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

- Is it justified?
- Is it consistent with national policy?

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?**

Paragraph 129 of the NPPF refers to using design review. It does not suggest this process is subject to viability.

The use of "Viability" here is likely to cause confusion, as it does not specify whether it is the cost of funding a Design Review session (some £3000 per session maximum) that is to be subject to viability, or that the cost of implementing the proposed changes and recommendations in the content of any such review is "subject to viability". If the latter this does not give the right message that the Design Review could be helpful to a Developer, saving costs further along the way in redesign and maintenance bills.

**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**



Design Review can offer the Council valuable advice to help judge if proposals meet policy, and should be used proportionately to major schemes, and to Reserved Matters applications for phased projects where each phase is itself a major project, and on only smaller ones in highly sensitive locations.

#### How would you like to be notified?

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	48
<b>Response Date</b>	25/03/19 13:57
<b>Consultation Point</b>	7.10 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

The Council envisage design reviews taking place during the assessment of large and complex sites. However, the Council recognises the benefits of early engagement in line with paragraph 62 of the NPPF and will facilitate constructive dialogue at the pre-application stage.

**Do you consider the proposed modification is:**       Sound?  
(please mark the appropriate box)

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

#### How would you like to be notified?

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	47
<b>Response Date</b>	25/03/19 13:55
<b>Consultation Point</b>	Policy EC 05 Town Centre and Retail Strategy ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM14 2 changes to the convenience, comparison and food and beverages floorspaces for Attleborough.

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?** . Is it consistent with national policy?

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?**

The reduced figures ~~4025~~ 578, and ~~1242~~ 1,016 and 820 (total 2,414 sq metres) shown in the table in the policy are not followed in a recent planning permission so this policy will not be implementable.

The amount of approved in the recent Attleborough Strategic Urban Extension (referred to as SUE) 3PL/2017/0996/O outline planning application exceeds this new amount in the policy.

Attleborough Town Council also disagrees with the additional floorspace being allocated in the SUE rather than there being opportunity for some to be located instead in the town centre, as the imbalance will weaken the town centre's vitality and viability, contrary to the NPPF paragraph 85 a "promote their long-term vitality and viability allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries".

**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

The policy could reflect the NPPF.

**How would you like to be notified?**

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	46
<b>Response Date</b>	25/03/19 13:38
<b>Consultation Point</b>	6.18 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

The Attleborough Neighbourhood Plan is 'made'.

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification  
to be UNSOUND, please identify which test of  
soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally  
compliant or sound?**

Needs to update to reflect the made status of the Attleborough Neighbourhood Plan

**How would you like to be notified?**

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	45
<b>Response Date</b>	25/03/19 13:36
<b>Consultation Point</b>	6.17 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant  
reference number that you are commenting on from the Schedule of Proposed Main Modifications  
e.g. MM1**

MM13 6

at least 10 hectares

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification . Is it effective?  
to be UNSOUND, please identify which test of  
soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally  
compliant or sound?**

The land can be more than 10 ha.

**How would you like to be notified?**

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	44

<b>Response Date</b>	25/03/19 13:34
<b>Consultation Point</b>	Figure 6.1 Key for Employment maps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM13 5

Amend Picture 6.1 Summary of Attleborough Allocation to show the proposed allocated employment site more clearly without the proposed SUE boundary or indicative link road.

**Do you consider the proposed modification is:** . Sound?  
(please mark the appropriate box)

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

**How would you like to be notified?**

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	43
<b>Response Date</b>	25/03/19 13:32
<b>Consultation Point</b>	Policy EC 01 Economic Development ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM13 4

Attleborough - at least 10 hectares, as allocated in this Plan

Note this employment allocation is also in the made Attleborough Neighbourhood Plan.

**Do you consider the proposed modification is:** . Sound?  
(please mark the appropriate box)

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

**How would you like to be notified?**

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	42
<b>Response Date</b>	25/03/19 13:24
<b>Consultation Point</b>	Policy ENV 06 Trees, Hedgerows and Development ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM12 7 Where the loss of such features is demonstrably unavoidable, adequate replacement provision, preferably by native species will be sought.

suitably compensated for, taking into account the size and condition of the tree.

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?**

This could be a non-effective policy unless the native trees are from a bio-secure source. Especially important where national sites could have ecological corridor links to the site for development.

"Suitably compensated for" should be measurable. This could be in terms of replacing girth and spread, to recognise that the tree can be performing many functions: water absorption (aiding the SUDS management); transpiration from leaves (cooling areas during high heat conditions); shade (given by the tree for people fauna and flora when there is strong sunlight conditions); CO2 absorption and carbon lock functions. These will be proportional to the size, root system and canopy.

**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

Only trees from bio-secure sources should be used in new development to avoid spreading tree disease into the native tree population. Otherwise the policy could not only not be effective but could lead to

new diseases being introduced to the ecological corridor that is one of the purposes of the Linear Park in Attleborough, and through links spread diseases to nationally significant sites.

Suitably compensated should reflect the size and canopy loss. This could require trees of a substantial girth to be replaced by several trees.

#### How would you like to be notified?

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<b>Comment by</b>	Attleborough Town Council (Mrs Elizabeth Wrigley - 1204406)
<b>Comment ID</b>	41
<b>Response Date</b>	25/03/19 13:16
<b>Consultation Point</b>	Policy ENV 04 Open Space, Sport & Recreation ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM12 3 having regard to the need for land acquisition, provision of facilities and 10 years maintenance.

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?**

There needs to be some consistent approach to timescale of maintenance.

Attleborough Town Council welcomes the inclusion of maintenance in developer contributions. Whilst maintenance for 10 years is felt to be positive, Members would have preferred 20 years in the case of the Linear Park for the Attleborough Strategic Urban Extension (referred to as SUE).

**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

The Attleborough SUE Linear Park will be delivered in phases over the next 20 to 25 years. The maintenance contribution for this facility should therefore also last over the same period.

We suggest change to provide clarification on maintenance where there is phasing of development, to cover the whole timeframe. For a phased deliverable facility the wording could clarify that each individual phase as it is completed begins a 10-year maintenance contract from the Developer.

**How would you like to be notified?**