

Comments

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

Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	10
Response Date	22/02/19 09:39
Consultation Point	Map 11.13 Saham Toney Settlement Boundary (View)
Status	Processed
Submission Type	Web
Version	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

MM157, Saham Toney settlement boundary

Do you consider the proposed modification is: Legally compliant?
(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 effective?

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

Map 11.13 incorrectly includes part of the Watton settlement boundary on the map intended for Saham Toney (at the bottom right of the map)

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

Remove the section of the Watton settlement boundary from the Saham Toney map

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified? By post to my address
 By email to my email address

Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	9
Response Date	22/02/19 09:19
Consultation Point	Policy ENV 01 Green Infrastructure (View)
Status	Processed
Submission Type	Web
Version	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

Not a main modification comment; included only for the consideration of Breckland Council

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

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

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

Clarify that the Policy Map referred to in Policy ENV 01 is the Green Infrastructure Policy Map

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified? . By post to my address
. By email to my email address

Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	8
Response Date	22/02/19 08:59
Consultation Point	Policy HOU 03 Development Outside of the Boundaries of Local Service Centres (View)
Status	Processed
Submission Type	Web
Version	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

MM15, Policy map for Watton

**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 positively prepared?
- . Is it justified?
- . 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 map for Watton includes large areas of the Parish of Saham Toney, but because the Parish boundary is not clearly identified, the map gives the false impression that those parts of Saham Toney are covered by Local Plan policies relating to Watton

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

Either remove all elements of Saham Toney from the Watton Policy map or much more clearly indicate the boundary between Watton and Saham Toney and add a note to confirm that elements of Saham Toney shown are not part of the Watton Policy map

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified?

- . By post to my address
- . By email to my email address

Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	7
Response Date	22/02/19 08:54
Consultation Point	3.20 Paragraph (View)
Status	Processed
Submission Type	Web
Version	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

MM16 new paragraph 3.20

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 positively prepared?
. Is it justified?
. 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 date of applicability of criterion 2 (of Policy HOU 04) needs clarification. An allocation start date relating to the adoption date of the Local Plan does not apply to any other level of the settlement hierarchy, and so unlike policies for those other levels, Policy HOU 04 takes no account of the number of completions and commitments since the criterion was first proposed.

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

It is suggested that supporting text be added to specify that all dwellings granted **full** permission after adoption of the Local Plan will be included in a count to monitor against the 5% limit (i.e. Dwellings given outline planning permission before the adoption of the Local Plan, but full permission only after adoption **will count** towards the 5% limit)

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified?
. By post to my address
. By email to my email address

Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	6
Response Date	22/02/19 08:50
Consultation Point	HOU 04 - Villages with Boundaries (View)
Status	Processed
Submission Type	Web
Version	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

MM17

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 positively prepared?
- . Is it justified?
- . Is it effective?

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

- 1) Policy HOU 04 refers to policy maps. The Policies map for Saham Toney is incomplete as it does not include the full southern extent of the Parish boundary. This error was pointed out in response to the previous consultation, but has not been corrected in the current document. This is most relevant to the central grid square between the 590000 and 590500 coordinates, since the omission means areas of Saham Toney subject to high flood risk and included in the SPA buffer zone are not included. This is also the area most subject to development pressure that could lead to coalescence of Saham Toney with Watton (something that criterion 4 of Policy HOU 04 seeks to avoid), so it is vital it is correctly included. Additionally the southern Parish boundary with Watton needs to be more clearly indicated to better distinguish those features on the Policy map that actually relate to Watton not Saham Toney, for example allocated site LP[104]008.
- 2) Criterion 2 of Policy HOU 04 is vague and subject to interpretation of the term "significantly" with regard to expansion beyond the 5% limit.
- 3) For consistency with Policy HOU 02 a footnote "Neighbourhood Plans can seek to exceed the limit imposed by criterion 2" should be added.
- 4) The date of applicability of criterion 2 needs clarification. An allocation start date relating to the adoption date of the Local Plan does not apply to any other level of the settlement hierarchy, and so unlike policies for those other levels, Policy HOU 04 takes no account of the number of completions and commitments since the criterion was first proposed. It is suggested that supporting text be added to specify that all dwellings granted **full** permission after adoption of the Local Plan will be included in a count to monitor against the 5% limit (i.e. Dwellings given outline planning permission before the adoption of the Local Plan, but full permission only after adoption **will count** towards the 5% limit)

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified?

- . By post to my address
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Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	5
Response Date	21/02/19 13:26
Consultation Point	Policy GEN 05 Settlement Boundaries (View)
Status	Processed
Submission Type	Web
Version	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

MM11, amended second paragraph and bullet points

Do you consider the proposed modification is: . Legally compliant?
(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 positively prepared?
. Is it effective?

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

There is insufficient recognition of made neighbourhood plans

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

Add to bullet points:

"Relevant policies of an applicable made neighbourhood plan."

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified? . By post to my address
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Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	4
Response Date	21/02/19 13:19
Consultation Point	GEN 1 - Sustainable Development in Breckland (View)
Status	Processed
Submission Type	Web
Version	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

MM4, revision to final paragraph of Policy GEN 1

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?
. 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?

Reference to "policies of most importance" is not specific enough and does not make clear that this will include the policies of a made Neighbourhood Plan.

There is insufficient recognition of NPPF paragraph 14's requirements in the proposed text

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

Add to "policies of most importance", the text "including those in an applicable made neighbourhood plan".

Add text to fully reflect NPPF paragraph 14.

Would you like to be notified of future stages of the Local Plan? Yes

How would you like to be notified?

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Comment by	Saham Toney Parish Council (Mr Christopher Blow - 963732)
Comment ID	3
Response Date	21/02/19 12:56
Consultation Point	1 Introduction (View)
Status	Processed
Submission Type	Web
Version	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

Not a comment to a Main Modification, but for the attention of Breckland Council:

Renumber all sections to correctly reflect additions and deletions

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?

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

Not applicable in this case

Would you like to be notified of future stages of the Local Plan? Yes

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