

Brennan, Charlotte

From: Scales, Andy
Sent: 06 September 2018 14:53
To: Programme Officer
Cc: 'Cameron, Sara'; CPTEstates
Subject: Attleborough - Land off Hargham Road - SUE - Modification to exclude site from Examination Version of LP

Hi Charlotte

Thank you for taking the time to speak to me this afternoon regarding the above matter.

Please see below a link to the copy of the modification received from Jemma yesterday (and I would be grateful if you could confirm the date when this modification was formally made to the Inspector - as the copy received is undated)

<https://breckland.gov.uk/media/10120/EX-92/pdf/EX.92.pdf>

You will see from the e-mail below (a note of the main point of my telephone conversation with Jemma yesterday), my concerns regarding the modification details forwarded (including in terms misleading information and limited justification).

You helpfully detailed that the Inspector has sessions arranged w/c 18 September however you will appreciate that it would not be possible or reasonable to make written representations and appear at a hearing session based on the limit period available.

I would be grateful if you could draw this matter to the attention of the Inspector and I look forward to observations and comments on this matter at your earliest convenience.

If you need any further information, please do not hesitate to call or e-mail me.

Kind regards

Andy

Andy Scales Head of Planning Consultancy

NPS Property Consultants

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From: Scales, Andy
Sent: 05 September 2018 12:59
To: 'jemma.march@breckland.gov.uk'
Cc: Cameron, Sara ; CPTEstates ; 'phil.mileham@breckland-sholland.gov.uk'
Subject: RE: Attleborough - Land off Hargham Road

Hi Jemma

Thank you very much for talking my telephone call regarding the above matter but I am disappointed that I have had to contact you despite requests for clarification on this matter on 15 August.

It is disappointing that you were neither familiar with the history of the site promotion nor recent planning history in relation to discussions with development management colleagues and Planning Committee decisions.

- The above site is owned by NCC and has been promoted for development by NPS for several years. This has included supporting the principle of its development for housing (as recognised by submission versions of the Local Plan and Attleborough Neighbourhood Plan allocations);
- NCC have undertaken extensive work at significant cost based on this consistent policy position;
- BDC approved consent for housing as recently as June 2018 on land south of New Road with reference to this emerging policy without any reference to potential conflict with policy GEN4
- A modification has now been submitted by BDC to seek to omit the NCC land without any prior discussion with the landowner or agent (you accepted that this was a mistake);
- The proposed modification submission to the Inspector is misleading as there has been no discussion, engagement or consultation with the landowner or agent in relation to this change;
- You highlighted the potential conflict with policy GEN4 but I noted no reference is made to the wording in this policy in the extract you sent to me;
- You accept that the site has not been considered as a separate allocation when the modification was made nor revising the wording of policy GEN 4 to allow its development;
- The justification advanced makes no reference to the recent decisions or wider consideration of the NCC owned site;
- As the NCC site is located to the west of the rail line, servicing and infra-structure are less complex or problematic (as demonstrated by the June Committee decision) and differ from land to the east including its ability to be serviced separately without the need for the completion of the new road link.

I would respectfully request that you review the modification at this stage and propose a further revised modification to either allocate the NCC land as a separate allocation (as this has been excluded from 'allocation' without consultation or justification), or policy GEN4 is reworded to enable this site to come forward at an early stage for housing

Notwithstanding the above, I also look forward to receiving details of how to raise this matter with the Programme Officer and Inspector.

I have copied this to my client at NCC who I am sure will wish to raise this at a more senior officer level.

I trust this that will be the start of a productive dialogue on this matter.

Kind regards

Andy

From: March, Jemma
Sent: 05 September 2018 10:40
To: Scales, Andy
Cc: Phil Mileham ; Hunter, Fiona
Subject: RE: Attleborough - Land off Hargham Road

Dear Andy,

The Council have submitted a note to the Inspector in regard to this matter (please see link below). This provides an explanation of the Council's position.

<https://breckland.gov.uk/media/10120/EX-92/pdf/EX.92.pdf>

If you have any queries please contact me directly.

Regards,

Jemma

Jemma March BA(hons), MA, MRTPI | Planning Policy Team Leader

Breckland District Council

Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE



Think of the environment...please don't print this e-mail unless you really need to



From: Scales, Andy
Sent: 05 September 2018 10:32
To: Phil Mileham; March, Jemma
Subject: FW: Attleborough - Land off Hargham Road

Hi Phil / Jemma

I refer to the e-mail correspondence below with Robert Campbell (where I also copied you in Phil) and I would be grateful if you or a relevant colleague, could contact me to discuss this important matter further.

Kind regards

Andy

Andy Scales Head of Planning Consultancy

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From: Scales, Andy
Sent: 15 August 2018 12:03
To: 'Campbell, Robert'
Subject: RE: Attleborough - Land off Hargham Road

Many thanks

Andy

From: Campbell, Robert
Sent: 15 August 2018 11:59
To: Scales, Andy
Subject: RE: Attleborough - Land off Hargham Road

Hi Andy

I will pass on your e-mail to the Local Plan team. I haven't been across your representations so I can't comment. As you'll probably know, David and I have been concentrating on looking for employment sites in Attleborough (and Snetterton) for the Multimatic project.

I will ask them to contact you.

Regards

Robert

Robert Campbell | Inward Investment Manager | Breckland Council
www.breckland.gov.uk

From: Scales, Andy
Sent: 15 August 2018 10:41
To: Campbell, Robert
Cc: Dukes, David; 'Hughes, Simon'; 'Cameron, Sara'; CPTEstates; Phil Mileham
Subject: Attleborough - Land off Hargham Road

Hi Robert

I refer to the above sites, owned by Norfolk County Council, which have been promoted in the development plan process for development over several years by NPS Property Consultants Ltd on behalf of the County Council.

David has kindly passed me on your advice dated 14 August 2018 regarding the two Norfolk County Council owned sites he highlighted (and your advice accords with the approach that I had suggested the District Council would take).

However in your correspondence, I was very surprised and dismayed to read para 1.4 of section 2.0 which states

'Whilst not yet in the public domain the Planning Policy Team have advised that the emerging Attleborough SUE allocation will be changed to exclude both of the sites being considered by the appraisal. This is because they have not been included within the Outline Planning Application and are not necessary to deliver the development required.'

However, these two sites fall within the SUE in the published emerging BDC Plan and Attleborough Neighbourhood Plan. Furthermore, an outline planning application on one of the sites (land west of Hargham Road / south of New Road) has Committee authority (initially granted March 2018) for residential development and I am frustrated that this is still awaiting BDC completion of the s106. This was granted on the basis of the clear direction of travel of policy (the site in the SUE) and shortfall in five year housing land supply,

Furthermore, and more fundamentally, Norfolk County Council is at an advanced stage in preparing an outline planning application for residential development on land east of Hargham Road (also in the published SUE) which is to be submitted later this year. This has been subject to extensive pre-application technical work. Therefore any change to the SUE to omit this area will be subject to very strong objection in view of the long established direction of travel provided by the District Council regarding housing development on this site (plus the contribution this should make to housing supply) .

I would be grateful if you can pass on this matter to your planning policy colleagues and I would be pleased to have an opportunity to meet with you and / or your planning policy colleagues to discuss this matter further. I can be contacted by e-mail at the above address or on 01603 706150.

I look forward to hearing from you.

Kind regards

Andy

Andy Scales Head of Planning Consultancy

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From: Dukes, David
Sent: 14 August 2018 17:04
To: Hughes, Simon
Cc: Scales, Andy
Subject: FW: Land in attleborough

Hi Simon and Andy

Further to yesterday's discussion I got this today from BDC. I think it is helpful and is the first time I have seen a plan showing where BDC see employment growth being directed. How do we identify landowners there?

Regards

David

From: Campbell, Robert
Sent: 14 August 2018 16:26
To: Dukes, David
Subject: RE: Land in attleborough

Hi David

I've attached our planning team's informal appraisal of the two NNC sites in Attleborough.

And I've spoken to them this afternoon, so a brief summary of that conversation:-

1. Regarding Attleborough sites, preference is for the Multimatic development to take place on an existing preferred or adopted employment site (which of course the two NCC sites are not)
2. So if we are keen to use one of these two NCC sites, then we have to give reasonable evidence that none of the other already preferred or adopted sites in Attleborough is available or suitable.
3. So the suggestion is that we investigate the following:-

(some of this you will already be able to answer)

- a. Is the remaining land next to the RG Carter available and big enough?
- b. Is the remaining land next to the new Eastern Attachments site available and big enough?
- c. Is there any land off Bunn's Bank Road which is available which is big enough (planning do not think it's all developed).

If the response to a, b and c is not available or not big enough then we next need to look at:-

d. The two new allocations in the local plan. These are just off the A11 on London Road, just after Breckland Lodge on the LHS as you drive into Attleborough. Whilst these are not yet formally adopted, they are preferred and so would need to be investigated. This would mean approaching the land owners. They are the two allocations marked in purple as LP[002]007 and LP[002]029. In theory, the fact that the landowners have put them forward for employment status should mean that they have an interest to sell or develop for employment use. In practice this is not always the case!

So planning would expect us to look at the current preferred/adopted employment sites before turning to other non-adopted sites. It doesn't rule out the NCC sites at all, but it's an indication of what they would reasonably expect us to explore first.

Let's have a quick chat and discuss next steps.

Regards

Robert

Robert Campbell | Inward Investment Manager | Breckland Council
www.breckland.gov.uk

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