



## 7. Neighbourhood Plan Options

7.1 The options considered during the evolution of the ANP are at this stage of the SA evaluated against the SA objectives framework.

7.2 This stage was undertaken in strategic terms for housing and employment allocations in the Core Strategy of the District Plan. Attleborough was assigned as a growth area for 4,000 homes. The Neighbourhood Plan is compliant so it accepts the housing but requires adequate and timely infrastructure to be put in place.

7.3 In looking at the options, the Steering Group set up seven Theme Groups to work on aspects of the Neighbourhood Plan. Site allocation options and policy options were discussed in each of these Theme Groups.

Theme 1: Local Economy

Theme 2: Housing

Theme 3: Transport & Communications

Theme 4: Education & Learning

Theme 5: Health & Social Care

Theme 6: Sports, Leisure & Community Facilities

Theme 7: Environment, Sustainability & Design



## **Theme 1 Local Economy**

7.4 When the Economy Theme Group started its work there were three possible employment sites on London Road. The Theme Group debated the options and members presented them at the Business Forum, who accepted by them as good options. They then went onto the Town Council web site as part of the consultation process. However, since then one has been allocated to educational use, one has been confirmed as a planning application for a firm consolidating its operations to Attleborough from several other parts of Norfolk, and the third is also earmarked for a local expanding firm. Based on this uptake in just two years, the ANP has taken a prudent decision to allocate further land on London Road, shown as an option in the Autumn 2015 ANP consultation. The landowners consent to its inclusion, and it should be noted that all of the sites were subjected to Sustainability Appraisal for employment use as part of the BC site options work.

## **Theme 2 Housing**

7.5 The ANP was not set up to explore different housing site allocation options.

## **Theme 3 Transport & Communications**

7.6 The ANP was not set up to explore different transport site allocation options.

## **Theme 4 Education reorganisation and site options**

7.7 Site allocation options for education sites were debated extensively as part of the reorganisation for Norfolk's Primary schooling system, with concurrent ANP option debates. However in 2014 - 2015 the ANP Theme Group made strong interventions, together with the school heads, to advocate the site on London Road next to the Taylor Wimpey housing development. NCC has since chosen this site for relocating the Infants School to become a Primary School on London Road, thus freeing up land for the Academy to also expand on its town centre site.

## **Theme 5 Health & Social Care options**

7.8 Health provision expansion was identified early as another key ANP priority, for the GP facility to relocate onto a single site and grow to meet the needs of the expanding town population. Therefore site options were explored in the Theme Group and reported in the consultants' study. Amongst several options considered, one preferred option has emerged, alongside a thorough review of options for the delivery of health and social care. The site on Station Road is the preferred option as the town grows since it will be centrally located.



7.9 A desire to offer integrated health social care and accommodation has led to a refined brief, based on a model of provision delivered elsewhere in Norfolk, in Aylsford. The housing required for those with health and social care needs was assessed and the current provision would only satisfy 10% of potential demand over the plan period. A site search for a 65 bed dual registered facility is now under way, with the current preferred site option being on an NCC owned disposal site on Hargham Road. Though deliverable, this is still under negotiation, and the fall back option would be to seek an alternative site within the growth area designated by Breckland Council (marked on maps as the SUE).

### **Theme 6 Sport, Leisure and Recreation options**

7.10 The town has suffered from a lack of parks and informal open spaces throughout its recent history (deficits identified in Local Plans in the last quarter of the 20th century are still not rectified.) The Sports Theme Group commissioned studies of Sports, Formal and Informal Recreation and Play facilities. The Breckland Council Open Spaces Parish Schedule lists key statistics for Attleborough on page 10. Even leaving aside the informal recreation for all ages, the Outdoor Sports are 6.17 ha below the National Playing Fields standards, Children's Play Space is 6.07 ha below standards, and 69% of the population are not living in a catchment for equipped play spaces. Many small and fragmented amenity green spaces exist but the town lacks walking routes, has few points of access to the surrounding countryside, and due to the general lack of space, places to walk dogs conflict with places to play games.

7.11 Options were considered in a consultants' report commissioned by the ANP Steering Group. This made several recommendations for increasing provision, including providing a completely new sports centre for indoor sports, together with a programme to provide both formal and informal outdoor open space over time.

7.12 Options considered by the ANP included investigating whether Attleborough Academy should move to a new Greenfield site and share facilities with a new Indoor and Outdoor Sports Facility for the whole town. There was not site available and insufficient likelihood of funding for this option to be pursued.

7.13 A preferred option has emerged in which Gaymer's Fields, with an essential extension, would accommodate all formal outdoor sports pitches, including those currently used on the Recreation Ground. Once these moved to the new site, the Recreation Ground would then become an informal open space, an ideal location close to the new GP surgery and Connaught Hall so that there would be synergy for health and recreation. An informal play destination would be created, and places to meet



could be created in a refurbished/re-provided venue in what is now the Football Pavilion building. As a start in this process the owner of the proposed extension has been identified.

## **Theme 7: Environment, Sustainability & Design**

7.14 Options debated under the Environment Theme included introducing a standard that is above the national Building Regulations for all new building in the town. The District Council could not support this due to change in Government Planning Policy. Instead the ANP is seeking design review and Building for Life dialogue with all developers of major sites in an effort to raise the quality of the urban design and placemaking in the town.

7.15 Local Open Spaces. Decoy Common is a wildlife haven and could also become a Local Open Space with the protection this would afford it into the long term future, i.e. longer than the ANP or Local Plan time horizons. Gaymer's Field and its extension also need the protection of being designated as Local Open Spaces.

7.16 An early draft of the ANP put forward five proposed Local Open Spaces, as they were not in the current Local Plan draft by Breckland Council. However if they go into the Local Plan instead this would be an acceptable option. The District Council is of the view that the spaces already have adequate policy protection.

7.17 The developer of the SUE is being engaged on the process of defining a Linear Park through their land. Options will emerge during the discussions of their masterplan, and the ANP Proposals Map at their request shows the concept indicatively.

7.18 The evidence base on the town's character and heritage is available, *Attleborough Neighbourhood Plan Character Assessment* by the Attleborough Heritage Group, November 2015. This is not just addressing the visual impact of the buildings, but also shows the need for "appropriate open space" and giving recognition to the contribution to the town's character of key green infrastructure, and within the town centre in particular, the contribution to character of mature tree cover needs to be recognised in policy. Needing stronger recognition and protection are: the churchyard with its trees walls and green spaces; the trees in the Rectory garden and chestnut avenue along Station Road; and Queen's Square.

## 8. Sustainability Assessment of policies - tables showing policies against SA objectives

### Local Economy policies

SA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
LE. P1	Red	Red	Orange	Green	Orange	Green	Green	Orange	Orange	Green	Green								
LE. P2	Green	Red	Orange	Green	Orange	Orange	Green	Green	Green	Orange	Green	Green	Green						
LE. P3	Orange	Green	Green	Green	Green	Orange	Green	Green	Orange	Green	Green	Green							
LE. P4	Green	Orange	Orange	Orange	Green	Orange	Green	Green	Orange	Orange	Orange	Green							
LE. P5	Green	Orange	Orange	Green	Green	Orange	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green
LE. P6	Green	Orange	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green							

8.1 The policies that give protection to the Town Centre all score well in the SA. The policies using greenfield land will not meet the SA objective 1, however other uses occupying the brownfield sites will be sustainable. A growing town with few brownfield sites will inevitably use greenfield and the detail of development will mitigate the negative impacts, so that objectives 2-8 are very important to address in detailed design responses.

### Housing policies

SA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
H. P1	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green						
H. P2	Orange	Orange	Orange	Orange	Orange	Orange	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Orange	Green	Green
H. P3	Orange	Green	Green	Green	Green	Green	Green	Orange	Green	Green									
H. P4	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Orange

8.2 The housing policies will address community infrastructure, and the intention is to use the ANP policies to raise the weight given to environmental aspects of development such as timely provision of green infrastructure and greater emphasis on SUDS and reducing flood risk downstream, and social aspects such as housing for the older population.

## Transport Policies

SA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
TC .P1	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green						
TC .P2	Green	Orange	Green	Green	Green	Orange	Orange	Green	Green										
TC .P3	Orange	Orange	Orange	Orange	Green	Orange	Orange	Orange	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green

8.3 The developers and the LEP will provide the link road, which is intended to also contain congestion impact from new development, and in principle funding associated with this project will also enable the town centre to become a pleasanter place, but the outcome will have different impacts depending on the details of the schemes chosen for implementation. The policy to connect across the rail line that severs the town from the urban extension will help promote cycling provision and policies for roads in the town centre should have as their highest priority to enable better pedestrian connectivity. The impacts will depend on details worked up and contributions by developers to sustainable and healthier transport options. Fibre optics will help reduce the need to travel.

## Education Policies

SA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
ED .P1	Orange	Green	Orange	Orange	Green	Green	Orange	Orange	Orange	Green									

8.4 Whilst new primary schools will be on the greenfield urban extension, the land and buildings freed up in the town centre for the Academy expansion offer a sustainable redevelopment likely to reinforce the vitality and improve built form quality of this part of the town centre.

## Health & Social Care Policies

SA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
HS C.P 1	Red	Orange	Green	Orange	Orange	Green	Green	Green	Orange	Green	Green								
HS C.P 2	Green	Orange	Green	Orange	Orange	Green	Green	Orange	Orange	Green	Green								

8.5 The dual registered care facility will provide a housing need identified in the ANP. The site will probably be on greenfield land as no suitable brownfield site has been identified. However the GP surgery expansion preferred option would be building higher on an existing site: a sustainable option.

## Sports, Leisure and Community Facilities policies

SA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
SLC .P1	Red	Orange	Green	Orange	Orange	Green	Green	Green	Orange	Green	Green								
SLC .P2	Green	Orange	Orange	Orange	Orange	Orange	Green	Green	Green	Orange	Green	Orange	Green	Green	Green	Orange	Orange	Green	Green
SLC .P3	Green	Orange	Orange	Orange	Orange	Orange	Green	Green	Green	Orange	Green	Orange	Green	Green	Green	Orange	Orange	Green	Green
SLC .P4	Green	Orange	Orange	Orange	Orange	Orange	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green
SLC .P5	Green	Orange	Orange	Orange	Orange	Orange	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green
SLC -P6	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green
SLC -P7	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green
SLC -P8	Orange	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green

8.6 The majority of these policies make a positive contribution to most of the SA objectives. Detailed design for the Indoor Sports Hub and Outdoor Sports Hub pavilion will ensure the other objectives can be met. A new Indoor Sports Hall will probably need a greenfield location, but this also means that the existing hall at the Academy could be sustainably reused for a shared town/ school Theatre and other community uses. As this objective would be deliverable by the Academy with the NCC it is not in the power of the ANP to control. The Queen's Square Car Park redevelopment site is a sustainable town centre site that can have vibrant use rather than just being a car park.

## Environment, Sustainability & Design policies

SA	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
EDS .P1	Green	Green	Green	Green	Green	Green	Green	Green	Green	0	1	1	1	1	1	1	1	1	1
EDS .P2	Green	Green	Green	Orange	Green	Orange	Green	Green	Green	Orange	Green	Green	Green						
EDS .P3	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
EDS .P4	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green
EDS .P5	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green
EDS .P6	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green



8.7 The majority of these policies have sustainability at their heart. The ANP seeks a balance between housing and employment so the town does not grow to be a dormitory town. However as the employment land allocation proposal differs from the Core Strategy the decision form BC after consulting was that because the extent of land to be allocated was not known, a scoping report is required.

### **Summary**

8.8 The policies demonstrate sustainable credentials.

8.9 The policy LE.P1 requests at least 10 hectares so jobs and homes can be in a broad balance, but the total site is some 17 hectares, allowing for very generous landscaping. In principle there appear to be no environmental reasons not to allocate this land provided the policies are applied to its development from a sustainability perspective.



## Part 2: SEA Scoping Report for site A

### 9. Employment Land SEA/ SA Scoping Report

#### Background

9.1 The purpose of the Attleborough Neighbourhood Plan is to look at a wide range of issues currently affecting the town and also to consider what will be required in the future to accommodate growth and provide for the sustainable development of Attleborough. It seeks to do this by guiding new employment and investment opportunities, identifying and directing how the transport network of the town can be improved and adapt to changes, where community facilities should go and through the provision of open space and green infrastructure how walking, cycling should be improved. The neighbourhood plan covers a 20-year period from 2016 to 2036.

#### Screening Opinion details

9.2 The request for a screening opinion was made in November 2015. The response was received on 16 03 2016 in a document entitled *Strategic Environmental Assessment and Habitats Regulation Assessment*. The screening opinion received from Breckland Council stated: “An SEA scoping report should be incorporated with the SA and accompany the Attleborough Neighbourhood Plan”. The screening report refers to a draft policy to seek an additional allocation for employment use. The only comment from the Statutory Consultees to the Screening Opinion is to ask to confirm the size of the site so its impact can be measured. The Policy requests at least 10 hectares so jobs and homes can be in a broad balance, but the total site shown in the Proposals Map site A is some 17 hectares, allowing for very generous landscaping. In principle there appear to be no environmental reasons not to allocate this land provided the policies are applied to its development from a sustainability perspective.

#### Economic Evidence relating to employment land

9.3 PACEC report 2008 on the potential impact of 4,000 additional homes Para 19 suggested both protecting all the existing employment sites and allocating 5-10 ha of additional land that “will need to be well related to the A11”, but this was in the light of policy in the Core Strategy suggesting the bulk of additional employment would go elsewhere, e.g. 30 ha at Snetterton, essentially making



Attleborough, as it grows by at least 11,000 people, a commuter dormitory town. The ANPSG has commissioned a brief study of the local economy. This is under way and will be completed by mid August 2016.

## **10. Stages in SA Scoping**

10.1 Stage A in the SA process involves developing the framework for undertaking the appraisal – in this case the identification of a series of spatial areas and topics on which the appraisal will focus – together with an evidence base to inform the appraisal.

10.2 Identification of spatial areas and topics on which the appraisal will focus. The Attleborough Neighbourhood Plan boundary is shown on the map in section 6 of this report. The map of the allocation proposed on London Road is site A on the map given here.

10.3 Stage B in the SA process involves undertaking the appraisal itself, undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan. This report is at this stage.

10.4 Stage C in the SA process involves documenting the appraisal findings and preparing an SA Report (this incorporates the material required for inclusion in the ‘Environmental Report’ under the ‘SEA Directive’). The full SA Report should be published for consultation alongside the ‘pre-submission’ version of the Neighbourhood Plan.

10.5 Stage D in the SA process involves consulting on the ‘pre-submission’ version of the plan and the accompanying SA Report.

10.6 Stage E in the SA process involves monitoring the adopted/ made plan including its sustainability impacts; this is done through the Local Plan and the Council’s Annual Monitoring Report (AMR).



## 11 Topics and areas for the SA

11.1 Topics: The Attleborough Neighbourhood Plan seeks a future that is not as just a commuter town, in which skills and employment opportunities are in balance with housing growth, and seeks a new site allocation on London Road well as a policy requiring the application of a test of impact of any loss to existing employment areas in the town, especially retail in the town centre, to ensure sufficient retail space is available as the town grows.

11.2 Identification of spatial areas and topics on which the appraisal will focus:

The Attleborough Neighbourhood Plan boundary is shown on the map on page 10 of this report. The map of the allocation proposed, of some 17 hectares in total on London Road is site A in the overall Proposals Map below. It is sufficiently close to the A11 roundabout that it would enable traffic for the A11 to avoid the town centre.

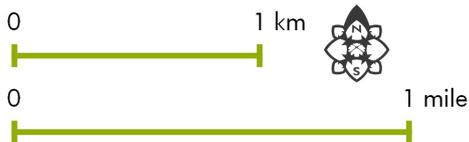


- A. Employment Land
- B. Community / Civic Centre, Library, Archive Centre, Hall, Toilets, Town Hall Offices, Tourist Information
- C. Decoy Common
- D. Gaymer's Field Extension

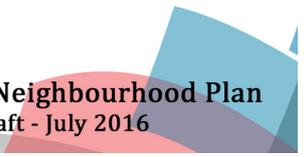
## Attleborough Neighbourhood Plan

Proposals Map  
June 2016

- Town Centre Boundary
- Settlement Boundaries
- Primary Shopping Area
- Preferred Growth Location (SUE)
- Link Road
- Significant Tree Avenues
- Open Space
- LinearPark
- Local Open Space
- Existing Employment Area
- Existing Housing Permissions
- Area of Search for Employment Land



Contains Ordnance Survey data. © Crown copyright and database right. Attleborough Town Council 0100056423





## 12 The evidence base to inform the appraisal

### National Planning Policy Framework

12.1 Analysis of the relevant policy context in the NPPF: a sustainable location reduces traffic commuting to other employment locations. The Basic Conditions Statement sets out more on the overall ANP and its policies in the NPPF context.

### Core Strategy Policy

12.2 The ANP accepts the housing suggested in the Core Strategy.

Biodiversity - Breckland Core Strategy policy CP 10 (and emerging Local Plan policies) will be used as a guide to expectations in the development control process.

Breckland Core Strategy policy for sites potentially affecting Listed Buildings and their settings, (together with the NPPF) will also be referenced.

### Emerging Local Plan policy and evidence base

12.3 Whilst the ANP cannot use policies in the emerging Local Plan to inform the Neighbourhood Plan, the evidence base for the emerging Local Plan can legitimately be used. Therefore the descriptions from the SA of emerging sites in the BC Sites analysis report December 2015 page 134 is used as the descriptions of the employment land site allocation. There are three sites that are combined as our preferred area of search as quoted in full below:

**LP[002]029** Retail Land, water and soil resources: Greenfield site; Agricultural land (grade 3); Issues surrounding water quality and water consumption are dependent upon type and design of development, not location. Highways comments concluded that the site must be considered "in the context of strategic growth". Climate change and air pollution: Issues surrounding waste and recycling are dependent upon type and design of development, not location. The SA concluded that development of the site would have a neutral effect, scoring more positively around social and economic indicators. Due to the location of the site it is considered that the site is suitable for employment rather than retail. Population and human health: The site is not within an AQMA and is situated within close proximity to key facilities that would improve the health and wellbeing of the population; Issues regarding the reduction and prevention of crime would be dependent upon type and design of development.

**LP[002]031** Employment Land, water and soil resources: Greenfield site; Agricultural land (grade 3); Issues surrounding water quality and water consumption are dependent upon type and design of development, not location. Climate change and air pollution: Issues surrounding waste and recycling are dependent upon type and design of development, not location. 2015 Highways comments stated [Sustainability Assessment & SEA Scoping Report draft](#)

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that the site considered "in the context of strategic growth" Population and human health: The site is not within an AQMA and is situated within close proximity to key facilities that would improve the health and wellbeing of the population; Issues regarding the reduction and prevention of crime would be dependent upon type and design of development. The SA concluded that development of the site would have a neutral affect overall; however, for residential development is distant from key services and facilities. Inclusive Communities: Development of the site would provide employment opportunities Economic activity: Employment site; access to the road network Interim Conclusion: 'Developable'

**LP[002]007** Employment Land, water and soil resources: Greenfield site; Agricultural land (grade 3); Issues surrounding water quality and water consumption are dependent upon type and design of development, not location. Highways comments concluded that the site must be considered "in the context of strategic growth" Climate change and air pollution: Issues surrounding waste and recycling are dependent upon type and design of development, not location. The SA concluded that development of the site would have a neutral effect, scoring more positively around social and economic indicators Population and human health: The site is not within an AQMA and is situated within close proximity to key facilities that would improve the health and wellbeing of the population; Issues regarding the reduction and prevention of crime would be dependent upon type and design of development. Interim Conclusion: 'Developable' Inclusive Communities: Development of the site would provide employment opportunities Economic activity: Employment site with access to the road network.

The work on the three sites undertaken for the SA for the Breckland Local Plan shows they are not in an AQMA. The sites allocated are all low quality agricultural land (grade 3).

### **13 Description of the current baseline situation**

13.1 Analysis of how the current situation might evolve in the absence of the plan allocation. Poor quality employment land remains underused, heavy outward commuting elsewhere in region, especially to outer Norwich is set as a pattern for next 50 years of the town's future.

13.2 Identification of any problems the plan may need to address: no land is available for the smaller more modern enterprises and raising skill sets in the community.

On the Locate in Norfolk web site of the 22 sites in Breckland area, only 2 are in Attleborough: Bunns Bank Attleborough site available freehold 0.77 ha, and Land Adjacent To Mr D's Diner, A11 Southbound, Besthorpe, Attleborough, NR17 2PU 0.85 ha freehold (locate Norfolk web site <http://norfolkpropertysearch.evolutive.co.uk/Results.aspx> - only 2 sites in Attleborough, and neither are convenient to get to, out of 6 Breckland pages).

13.4 The setting of the listed White Lodge is relevant to the employment site allocation. This would be included in the requirement for developing the site and a broad landscape strip along the site facing London Road would be required, to ensure the White Lodge retains a rural setting. Retaining existing hedges and mature trees wherever possible, and requiring an enhanced landscape with adequate SUDS strategy would also offer additional biodiversity opportunities.

Public House. c.1700. Timber framed and rendered. Thatched roof. One storey and attic. 2 C20 porches and 2, 3 or 4 light casements with glazing bars. 4 eyebrow dormers with rounded casements. South-east end is C20 with 2 further C20 extensions to rear. Interior has late C18 fireplace, otherwise original timbering removed.

Listing NGR: TM0276992960



White Lodge - seen looking north on London Road - is opposite the allocated site.



## 14 The SEA Options Analysis

14.1 Identifying the options considered and evaluating impacts of each option. Options for additional employment land emerged and were debated by the Employment and Economy Theme Group during its early discussions and also at meetings of the Attleborough & Snetterton Business Forum.

*Option 1 Keep only the existing employment areas.* Industrial areas used for B8, B2, existing businesses have no satisfactory alternative sites and low skill jobs continue to predominate.

*Option 2 Increase land allocation at Bunns Bank.* This will create additional HGV traffic in the town centre travelling to Norwich or to the west, and there will be risk of conflict between B1 and B2/B8 users on the site. As the Bunns Bank site is required for Banham Poultry to relocate to there could also be a lack of sufficient additional land

*Option 3 Use Snetterton for expanding local businesses.* This option increases commuting traffic on A11 to Snetterton, so is a less sustainable option. Also the Snetterton site is dominated by B8 logistics uses and low-level B2 employment uses. Evidence from the meetings of the Employment Group and of the Attleborough & Snetterton Business Forum shows that a local SME business was not willing to take up the option of moving to Snetterton, as it would involve the risk of staff loss. (ANPSG minutes 2014). ANP policy would not be met by this option as it will increase the housing to employment imbalance and also does not help to improve the range of high skilled jobs on offer in Attleborough.

*Option 4 Allocate land close to the A11 junction where there is already a cluster of business support services.* Three years' ago discussions of different sites were originally considered. The subsequent two years of discussion have seen the change in circumstances so that two of the sites that were originally discussed now have identified takers, e.g. the Norfolk firm Carters to relocate and expand on Victory Park, who are expected to put in planning applications in 2016, and the third has become a preferred primary school location. An additional site on London Road is therefore being proposed as the preferred option for the ANP. It is formed of the three Local Plan option sites described above, with a combined joint access. The Link Road when completed will deliver a roundabout opposite this site access, so that as new housing on the SUE is completed towards the end of the second decade of the ANP timescale, local residents working here could easily reach their place of work. Cycle and footpath links are also proposed crossing the SUE that can link to this site. Evidence indicates that access to good quality housing development is an important attractor of higher skill businesses.

## Preferred option

14.2 The preferred option is option 4, to designate a site consisting of land in a cluster near to the new SUE Link Road roundabout, within walking distance of the existing PH where it will bring further trade at lunchtime, and near to Breckland Lodge whose dining facilities and overnight accommodation will serve new businesses.

## 15 Habitats Regulation Assessment

15.1 The following statements are relevant:

“Growth at Attleborough will need to be considered alongside the findings and further recommendations of the Water Cycle Study, and should have particular regard for the isolated site of the Norfolk Valley Fens SAC located to the south west of Attleborough.” (Page 2 of Breckland Local Plan Habitats Assessment Report Dec 2015.) The site developer will need to have regard to water management as part of meeting existing planning policy.

The SEA findings show there is no likelihood of impact on the SAC from recreation, as the SAC is not accessible.

This is stated in the Screening Report response from BC: “If the Neighbourhood Plan is seeking a proposed policy to designate further employment land then it is considered that an SEA scoping report would be required to ascertain if the emerging plan is likely to have a significant effect on the environment. In this regard the Neighbourhood Plan is setting the Framework for future development consent of projects. This report has been informed by the opinions of the Statutory consultees who were consulted between 11/02/2016 and 17/03/2016. Their comments appended to this report.”

15.2 As part of the screening opinion the statutory consultees said:

4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the habitats Directive?(Art.3.2(b))?	The NP is unlikely to have any substantial effect on the network of protected sites. A Habitats Regulation Assessment Screening Report (2013) and the Assessment of the Breckland Local Plan at Preferred Directions stage (2015) were carried out as part of Breckland District Council emerging Local Plan. The Preferred Directions HRA rules out recreational impacts on Swangey Fen, as a component of the Norfolk Valley Fens SAC as it lies at over a kilometre to the west of the town, has no public access, no roads and is separated from the proposed urban extension by the A11.
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From: Strategic Environmental Assessment and Habitats Regulation Assessment Screening Determination. Attleborough Neighbourhood Plan March 2016.



15.3 The site is also within the impact zone of the Swangey Fen SSSI and the adjoining Norfolk Valley Fens SAC, which are located together about ½ km to the west beyond the A11, and the Old Buckenham Fen SSSI about 1 km to the east beyond Hargham Woods and the rail line. The ANP refers in its reasoned justification for its policy of improving biodiversity on all developments that this policy seeks to provide new habitats and connect existing areas “to form an ecological network identified in the Norfolk and Breckland District Ecological Network Mapping Report”. The proposed SME business site will need to conform to this policy. The business use proposed is unlikely to have any recreational impact on the wider designated habitats in the Brecks.

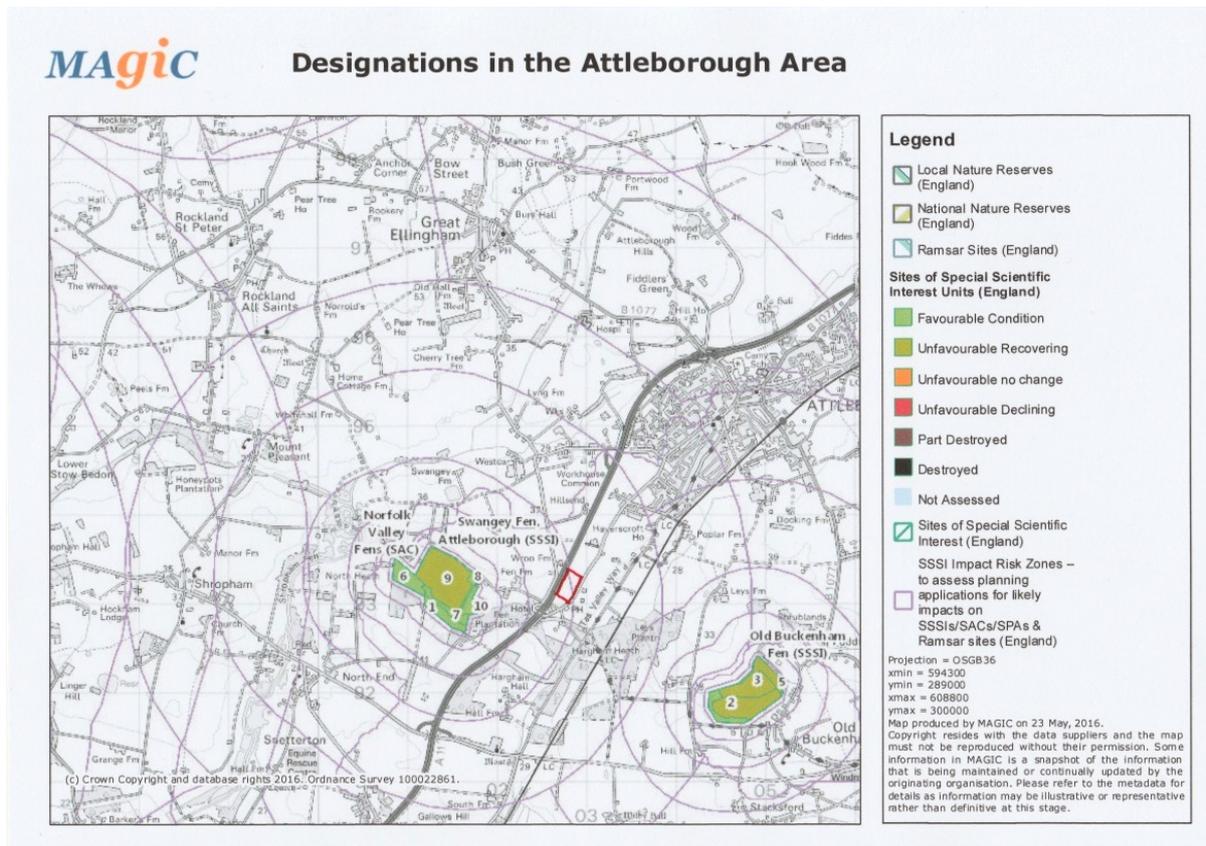
15.4 The MAGIC website, managed by Natural England, was used to identify designated nature conservation sites within 2km of the proposal site. Google Earth and/or Bing Maps aerial photographs, along with Ordnance Survey 1:25,000 maps, were used to examine the local landscape for features such as nearby ponds, woodland, hedgerows, etc. in the area beyond the landholding. The desk study found there are no designated nature conservation sites within 1km of the proposed employment allocation, but there are one SSSI and five County Wildlife Sites within 2km. The SSSI (Swangey Fen, Attleborough) is also designated as a Special Area of Conservation, as a constituent part of the Norfolk Valley Fens SAC. At distances of over 1km there is no realistic potential for the proposed development to impact these sites.

15.5 There is scope for ecological enhancement as part of the development. Hedgerow, tree and shrub planting on the developed site should use native species of ecological value to compensate for hedgerow loss and provide new and possibly enhanced habitat for various animals. Bird nest boxes and bat roost boxes could also be installed on the new buildings, providing improved opportunities for these animals to use the site. A wildlife area can also be created as part of the site landscape strategy, incorporating a range of features such as trees, ponds, woodpiles, and hedgerows. Hedges will be retained around the site perimeter, and additional landscape introduced on the perimeter.

15.6 There are also five non-statutory designated nature conservation sites are within 2km of the proposed development site. All five of these County Wildlife Sites are located to the south:

- Leys Plantation County Wildlife Site (CWS), approximately x km to the south: large semi-natural and plantation woodland and old heathland
- Woodland in Hargham CWS, approximately x.1km to the south: mature, broadleaved woodland.
- Hargham Heath CWS, approximately x.5km to the south: a birch, oak, hazel and ash woodland

- Fen Plantation CWS, approximately x.5km to the south-west: alder carr and mixed woodland
- Tollgate Plantation CWS, approximately x.6km to the south: blocks of broadleaved woodland and an area of mixed plantation.



### Swangey Fen

15.7 The location of this SSSI is shown above. The site is a species-rich, spring-fed fen of a type that is mostly restricted to East Anglia. Wet woodland and grassland surround the fen and the River Thet flows through it. The site supports notable areas of saw sedge *Cladium mariscus*. The site forms part of the Norfolk Valley Fens SAC, a disconnected network of fens across Norfolk, designated primarily for the presence of lowland alkaline fen habitat, narrow-mouthed whorl snail *Vertigo angustior* and Desmoulin's whorl snail *V. moulinsiana*. These sites also support a number of important habitats, which are qualifying features but not primary reasons for their designation.



## 16 Design and climate change

16.1 Issues raised under the objectives relating to water quality and water consumption, climate change and air pollution, and waste and recycling are all dependent upon details of the type and design of development, not the location, as are crime reduction and prevention objectives. Both the ANP and the Core Strategy have suitable policies for use in seeking these aspects of sustainable design outcomes from development.

16.2 The site allocation will help the ANP objective to improve the efficiency, competitiveness and adaptability of the local economy, will offer opportunities that could help people gain access to satisfying work suited to their skills, potential and place of residence, especially by offering workplaces in the same town as their homes. The access to work can also meet the objectives to improve wellbeing and redress inequalities.

## 17 Possible mitigation measures

17.1 An area of hedgerow habitat should be created on site to compensate for any losses. Replacement hedgerows should be planted over an area equal to or greater than the area to be removed. New hedgerows should be planted with a range of native shrub species such as hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, field maple *Acer campestre*, hazel *Corylus avellana*, elder *Sambucus nigra*, dogwood *Cornus sanguinea*, holly *Ilex aquifolium*, guelder rose *Viburnum opulus*, crab apple *Malus sylvestris*, spindle *Euonymus europaeus* and wild privet *Ligustrum vulgare*.

17.2 Since some of the hedgerow clearance will also result in the loss of a number of trees, an equivalent number of trees should be planted on the developed site. At least **five** of the following trees should be planted for every tree which is lost: English oak *Quercus Robur*, silver birch *Betula pendula*, hornbeam *Carpinus betulus*, crab apple *Malus sylvestris*, rowan *Sorbus aucuparia*, wild service tree *Sorbus torminalis*, wild cherry *Prunus avium*, wild pear *Pyrus communis*, small-leaved lime *Tilia cordata* and/or field maple *Acer campestre*.

EW Core Connections for the Attleborough Neighbourhood Plan Steering Group

7<sup>th</sup> July 2016

## Appendix 1: SA Objectives

1	Minimise the irreversible loss of undeveloped land and productive agricultural holdings
2	Limit water consumption to the capacity of natural processes and storage systems and maintain and enhance water quality.
3	Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality
4	Minimise the production of waste and support the recycling of waste
5	Reduce contributions to climate change and localised air pollution
6	Adapt to climate change and avoid, reduce and manage flood risk
7	Protect, conserve, enhance and expand biodiversity
8	Protect, enhance and increase Green Infrastructure in the District
9	Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character
10	Conserve and where appropriate enhance the historic environment
11	Improve health and well being
12	Reduce and prevent crime
13	Improve the quality and quantity of publicly accessible open space
14	Improve the quality, range and accessibility of essential services and facilities
15	Redress inequalities related to age, gender, disability, race, faith, location and income
16	Ensure all groups have access to affordable, decent and appropriate housing that meets their needs
17	Increase the vitality and viability of town centres
18	Help people gain access to satisfying work suited to their skills, potential and place of residence
19	Improve the efficiency, competitiveness and adaptability of the local economy

These are from the Breckland Local Plan Part 1 – Preferred Directions SA Reg18 Consultation Version December 2015. 16.12.15 final.



## Appendix 2

### **Evidence Base information used**

Local Authority evidence base – <http://www.breckland.gov.uk/content/documentlibrary-publication>

Norfolk Biodiversity Partnership – [www.norfolkbiodiversity.org](http://www.norfolkbiodiversity.org)

Norfolk Insight – [www.norfolkinsight.org.uk](http://www.norfolkinsight.org.uk)

NOMIS (official labour market statistics) - <http://www.nomisweb.co.uk>

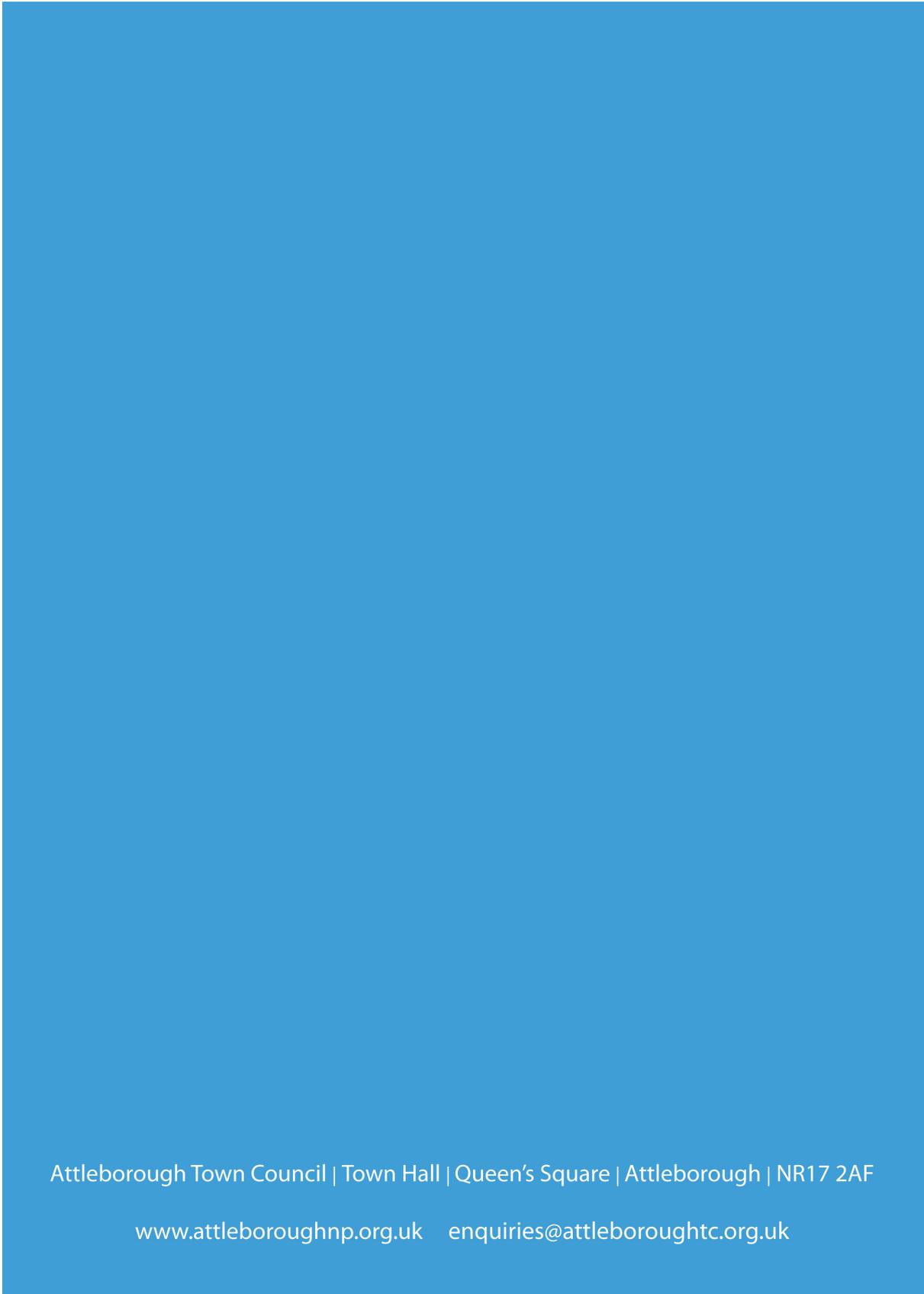
MAGIC defra mapping online

**Breckland Water Cycle Study: Stage 1 – Outline Study (2008): Prepared by Scott-Wilson on behalf of Breckland Council**

The study tests the overall water infrastructure needs including waste water treatment, and test the environmental capacity for growth in terms of water resources. The study will also investigate water efficiency measures and provide guidance for the implementation of sustainable urban drainage systems through new developments.

**Breckland Water Cycle Study: Stage 2 – Detailed Study (2010): Prepared by Scott-Wilson on behalf of Breckland Council**

The Stage 2 Detailed Study continued on from the Stage 1 Study and was undertaken for growth across the district, including Thetford. It has taken the findings of the Outline Study and determined the detailed solutions required to deliver growth for the specific identified preferred development allocations including detailed information on the cost of the infrastructure and the policy required to deliver it.



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