

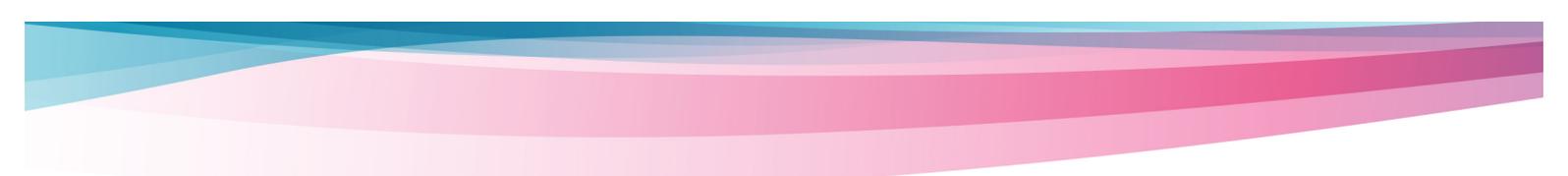
# Attleborough

## Neighbourhood Plan

2016 - 2036



## Sustainability Appraisal & Draft SEA



**Sustainability Appraisal  
& Strategic Environmental Assessment  
Attleborough Neighbourhood Plan  
February 2017**

**Part 1: SA**

**Part 2: SEA and HRA**

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## Abbreviations

Throughout the document you will find abbreviated in the following table:

AHG	Attleborough Heritage Group
ANP	Attleborough Neighbourhood Plan
ANPSG	Attleborough NP Steering Group
AQMA	Air Quality Management Area
ATC	Attleborough Town Council
BC	Breckland District Council
GI	Green Infrastructure
HRA	Habitats Regulations Assessment
LGA	Local Government Association
LP	Local Plan (emerging)
NCC	Norfolk County Council
NPPF	National Planning Policy Framework
PACEC	Public & Corporate Economic Consultants
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment Scoping Report
SFRA	Strategic Flood Risk Assessment
SME	Small and Medium-sized Enterprises
SUE	Strategic Urban Extension

## **1. Introduction**

1.1 This report forms the Sustainability Appraisal (SA) and Strategic Environmental Assessment Scoping Report (SAE) of the current draft Attleborough Neighbourhood Plan (ANP), February 2017 and incorporates changes following consultations.

1.2 The purpose of SA is to ensure that the principles of sustainable development are considered throughout the plan making process and that the ANP has considered all aspects of economic, social and environmental sustainability in its production. Once 'made', the ANP will be a development plan document used by Breckland District Council (BC) for decisions relating to the development of Attleborough in the future.

1.3 Strategic Environmental Assessment (SEA) is a requirement of the EC Directive on the assessment of the effects of certain plans and programmes on the environment (Directive 2001/42/EC) known as the SEA Directive. This is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004, which applies to plans with significant environmental effects (SEA Regulations). Throughout this document where sustainability appraisal is referred to, the requirements of SEA Directive have been incorporated.

## **2. View of Consultation Bodies**

2.1 Neighbourhood Plans must be in line with strategic environmental assessment and habitat regulations. Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 defines certain organisations with environmental responsibilities as consultation bodies. In England the environmental assessment consultation bodies are Historic England, Natural England and the Environment Agency, all of whom were consulted.

2.2 This report includes changes made in response to the comments received during the six week consultation on the ANP and the draft SA and SAE in July / August 2016, and changes in the ANP reflect comments subsequently received from the statutory consultees on the need for a Habitats Regulation Assessment. In order to assess whether the policies and sites in the ANP require a Strategic Environmental Assessment (SEA), ATC consulted BC in December 2015 for a Screening Opinion. This screening opinion indicated that an SEA was required as the ANP allocates an employment site, as there was uncertainty at that time about the exact wording of the

policy and site size and locations being considered, and more information was needed.

2.3 A draft SEA scoping report<sup>i</sup> was included in the SA for the ANP Regulation 14 consultation. The updated SEA is in part two of this document, and includes changes made in response to the comments received from BC and the statutory consultees.

2.4 BC's *Attleborough Neighbourhood Plan Habitat Regulations Assessment - Screening Report* dated September 2016 considered the Reg.14 ANP and stated that a habitat assessment will not be required. The report and the original Screening Opinion request submitted to BC are available on request from the Town Hall. They contain considerable evidence base material on the land, water and soil resources, biodiversity designations in the area, flood risk mapping, the Conservation Area and listed buildings locations.

### **3. Sustainability Appraisal**

3.1 The ANP needs to meet sustainability objectives, and this is in part demonstrated by our undertaking a draft Sustainability Appraisal (SA) of our vision, objectives and emerging policies, testing their social, economic and environmental impacts.

3.2. BC SA Scoping Report (July 2013), for their emerging LP developed a SA framework to test policy and allocation options, and we have used the same framework of objectives for the ANP assessment so it is compatible, transparent, and consistent Breckland Local Plan Part 1 – Preferred Directions Sustainability Appraisal December 2015 In the BC web site planning documents as a pdf SA\_part\_1\_consultation\_final\_16.12.15. The BC SA Framework is at: [http://consult.breckland.gov.uk/portal/planningpolicy/local\\_plan\\_preferred\\_sites\\_and\\_settlement\\_boundary/interim\\_site\\_allocations\\_and\\_settlement\\_boundary\\_review\\_sustainability\\_appraisal?pointId=s1455616049509#section-s1455616049509](http://consult.breckland.gov.uk/portal/planningpolicy/local_plan_preferred_sites_and_settlement_boundary/interim_site_allocations_and_settlement_boundary_review_sustainability_appraisal?pointId=s1455616049509#section-s1455616049509)

3.3 In terms of the HRA, Attleborough is distant from the majority of the European sites as shown in Figure 3 at the end of this document.

## 4. Non-Technical Summary

4.1 The ANP has been tested against the sustainability objectives – economic, social and environmental, used for assessing the emerging Breckland Local Plan (LP), so they are consistent.

4.2 We test the Core Objectives of the ANP against these objectives in section 6, and the Core Objectives are highly sustainable.

4.3 We then test each individual policy against the same sustainability objectives in section 8. The majority of the aspects of the ANP also emerge as highly sustainable. Individual sites can only be sustainable in their detail, which will depend on applicants following the policies in the ANP, the Development Plan of BC as the Local Planning Authority, and in national policy. Options for allocation were explored as set out in section 7 below. No housing allocations are made in the ANP as this process is being undertaken in parallel by BC as the new Local Plan emerges. In some instances the ANP Steering Group found how decision-making already happens, for NHS facilities and for Norfolk County Council's consultation on changes to the education system to create primary schools in the place of infant and junior ones, and the ANPSG Theme Groups were able to form partnerships. The ANP outcome is not just a land use one but a social one, the greater integration is the outcome, with an opportunity for the community to understand and influence the process and options explored.

4.4 The ANP allocates an additional area of land for small-scale employment uses so that in future firms could locate in Attleborough, and existing firms expand. This is site A in the ANP Policies Map 1. It would be economically sustainable, socially sustainable as residents can have local jobs meeting their skills levels, and environmentally sustainable as it will reduce commuting journey distances.

4.5 We suggest that using this land on London Road near the A11 for employment uses will mean that business traffic for the site does not need to use the town centre roads. The site would be boosted with new hedges and trees, will have high quality design so it attracts high technology businesses to cluster, and allows for very generous landscaping to buffer the listed White House and create a green gateway to Attleborough, and design policy to seek use of locally sustainable materials, as can be advised by the Enterprise Centre at the nearby University of East Anglia. 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.

4.6 Local businesses also went on a journey in seeking to understand how a Neighbourhood Plan might help them. Individual businesses lobbying for sites have expressed support for the proposed site through their representations at the revitalised Attleborough & Snetterton Business Forum where the ANP has been presented and debated on several occasions. The site allocated is supported by the Forum, and it also suggests this location will benefit the existing businesses in nearby pub and hotel facilities as these will be available for social and business interaction. As set out in section 7 other sites have also received planning permission during the ANP process, although not always in places or through decision-making methods that proceeded as the ANPSG would have wished.

4.7 We asked BC for a screening opinion on the need for a Strategic Environmental Assessment (SEA) of the employment site allocation. The Screening Determination from BC in March 2016 was that an SEA scoping report would be needed to see if the employment site allocation in the ANP is likely to have a significant effect on the environment. The letters are reproduced following paragraph 13.7: there was at that time considered to be uncertainty on the direction of employment land use policies in the ANP. During the summer 2016 formal consultation the need for a Habitats Regulations Assessment Screening Opinion for the entire ANP was also identified.

4.8 The SEA is in part two of this document. A draft SEA was consulted on together with the draft ANP in the summer 2016. The consultation response from BC was received in October 2016, following replies from statutory consultees, notably from Natural England directly to BC on 13 September 2016, and responses to ATC following paragraph 13.8. The SA/SEA includes changes made in response to the comments, and changes in the ANP also reflect comments received from the statutory consultees. BC advised a Habitats Regulation Screening Assessment was required on the whole ANP. Each of the ANP policies was assessed for its likely significant effects on identified European Designated Sites: Norfolk Valley Fens SAC; Breckland SPA/SAC /RAMSAR site; and Waveney & Little Ouse Valley Fens SAC/RAMSAR site.

4.9 *Attleborough Neighbourhood Plan - Habitats Regulation Screening Report* (September 2016) BC, concluded: “the assessment suggests that there are likely to be no significant negative effects on the European Designated Sites resulting from the Policies detailed within the draft ANP. Therefore, based on the submitted draft, a full Habitat Regulations Assessment is not required”. It is important to note the comment on pages 15-16 that the policy to support delivery of a Linear Park SLC.P5, and the

linked policy to provide a Green Infrastructure strategy, ESD.P1, offer “opportunities to incorporate habitats within the linear park to complement Norfolk Valley Fens SAC and provide landscape scale habitat connectivity” and design policy ESD.P5 offers the opportunity “to incorporate habitat creation within developments to increase their sustainability and create landscape scale habitat connectivity”. These comments are noted, and developing good working practices in partnership with the County and developers to realise such opportunities is a strong delivery objective of the ANP.

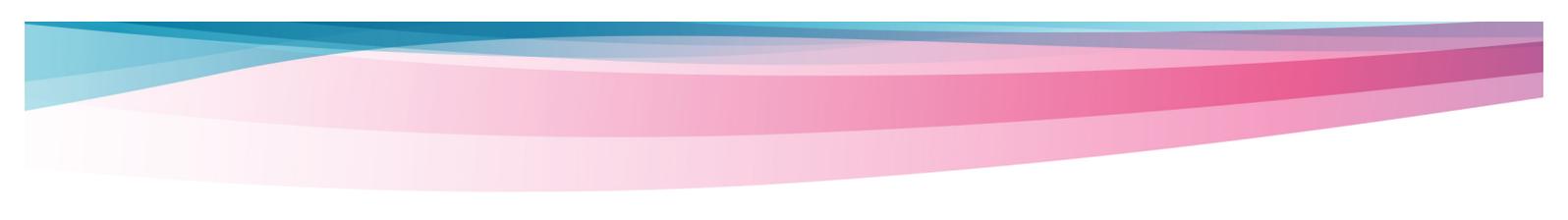
## 5. SA process and stages

<p><b>Stage A – Screening</b> Seeking a Screening Opinion</p> <ul style="list-style-type: none"> <li>Determine if a plan or programme requires an SEA</li> </ul>	<p>SEA determination done</p>
<p><b>Stage B – Scoping</b></p> <ul style="list-style-type: none"> <li>Consulting on the scope of the SA (the ‘Scoping Report’) Scope and level of detail and to develop assessment framework SA and SEA</li> </ul>	<p>Consultation done</p>
<p><b>Stage C – Developing plan options, refining alternatives and assessing likely effects</b></p> <ul style="list-style-type: none"> <li>Undertaking the assessment Test plan objectives against SEA framework Develop reasonable alternatives Evaluate likely effects Mitigation and monitoring</li> </ul>	<p>SA and SEA prepared</p>
<p><b>Stage D – Preparing the SA report</b></p> <ul style="list-style-type: none"> <li>Consulting on the draft NP and SA report</li> </ul>	<p>Pre-submission consultation done.</p>
<p><b>Stage E – Publication, consultation and adoption</b></p>	<p>Changes made. Submit to the LPA</p>
<p><b>Stage F – Monitoring</b></p>	

From: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/580028/ea2\\_033\\_20150209\\_fixed.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/580028/ea2_033_20150209_fixed.pdf)

5.1 We are now at stage E. The local planning authority must decide whether the ANP is compatible with EU obligations (including obligations under the Strategic Environmental Assessment Directive):

- when it takes the decision on whether the neighbourhood plan should proceed to



referendum; and

- when it takes the decision on whether or not to make the neighbourhood plan (which brings it into legal force). Source: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

5.2 In our case a statement of reasons for a determination under regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 has been obtained at the pre-submission consultation stage, see para 2.4 above, and states that the ANP as currently submitted is unlikely to have significant environmental effects.

## Part 1: The Sustainability Assessment of the draft Attleborough Neighbourhood Plan

### 6. SA framework and ANP Objectives

6.1 The framework of Sustainability Objectives used for the emerging LP is used to test the compatibility of the ANP objectives in terms of sustainability. The framework is relevant for Attleborough (as one of the two largest areas of expansion in the whole district, if the SA objectives are appropriate or the LP they would also be applicable to Attleborough) and these LP Sustainability Objectives have been through a consultation process and therefore have been used for the ANP rather than starting afresh. The framework is used to test the options for growth, site allocation and also to appraise the ANP as a whole.

6.2 The vision for the ANP is that Attleborough will strengthen itself as an enterprising, sustainable, attractive and prosperous Market Town within East Anglia. The vision will be delivered through a set of core objectives that have helped to shape and guide the policies within the Plan.

6.3 The core objectives are:

**CO 1** To view the town as one development area, with strong links and connections to its hinterland and beyond.

**CO 2** To preserve and enhance the heritage assets of Attleborough, especially in the historic centre of the town

**CO 3** To identify new employment land which can be developed and to encourage new industry to the town in order to provide a wide range of employment opportunities.

**CO 4** To promote the integration of businesses and Attleborough Academy Norfolk as partners in reducing the local employability skills gap.

**CO 5** To integrate the new housing to facilities into the town with the necessary footpath and cycle ways, and to address the outstanding traffic congestion in the town centre, to become an exemplar of sustainable transport within the region.

**CO 6** To provide housing which meets the needs of all, with a range of housing including affordable, 'older living' developments, and housing types which will encourage entrepreneurs and professional people to live in the community

- CO 7** To provide excellent health and community facilities within the town, including a single integrated health and social care facility.
- CO 8** To provide excellent new and improved sport and leisure facilities for the community, working with Attleborough Academy Norfolk and sport and community clubs and organisations
- CO 9** To promote all new buildings to incorporate the highest standards of design, new build methodology, materials and energy saving techniques.
- CO 10** To protect and enhance the natural environment, including additional high quality open space, enhanced biodiversity including integrating existing and new wildlife habitats
- CO 11** To promote and enhance the town to attract investors, developers and visitors by building on its heritage.

6.4 The following Objectives from the BC LP Part 1 Preferred Directions SA December 2015 are used in this SA.

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### **SA Objectives**

- 1** Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of on site resources to minimise the impacts on the environment and safeguard resources for the future generations
  - 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** To adapt to climate change and avoid, reduce and manage flood risk
  - 7** Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity
  - 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 the health and well being of the population.
- 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 existing town centres
- 18 Help people gain access to satisfying work appropriate to their skills, potential and place of residence
- 19 Improve the efficiency, competitiveness and adaptability of the local economy

6.5 The Sustainability Appraisal of Core Objectives using same SEA/SA Framework objectives as for the emerging LP Policies is shown in Table 1.

6.6 The ANP core objectives are very well aligned with the SA objectives. Amber assessments depend on site design for outcomes and would be addressed in the design of proposals to minimise adverse impacts and to mitigate them. Red is unavoidable as some greenfield land is required for development, to meet the Core Strategy objective of an additional 4,000 homes and a Strategic Urban Extension (SUE) to the south of the rail line.

**Table 1** Sustainability Appraisal of Core Objectives using same SEA/SA Topic headings as for the emerging Local Plan for Breckland.

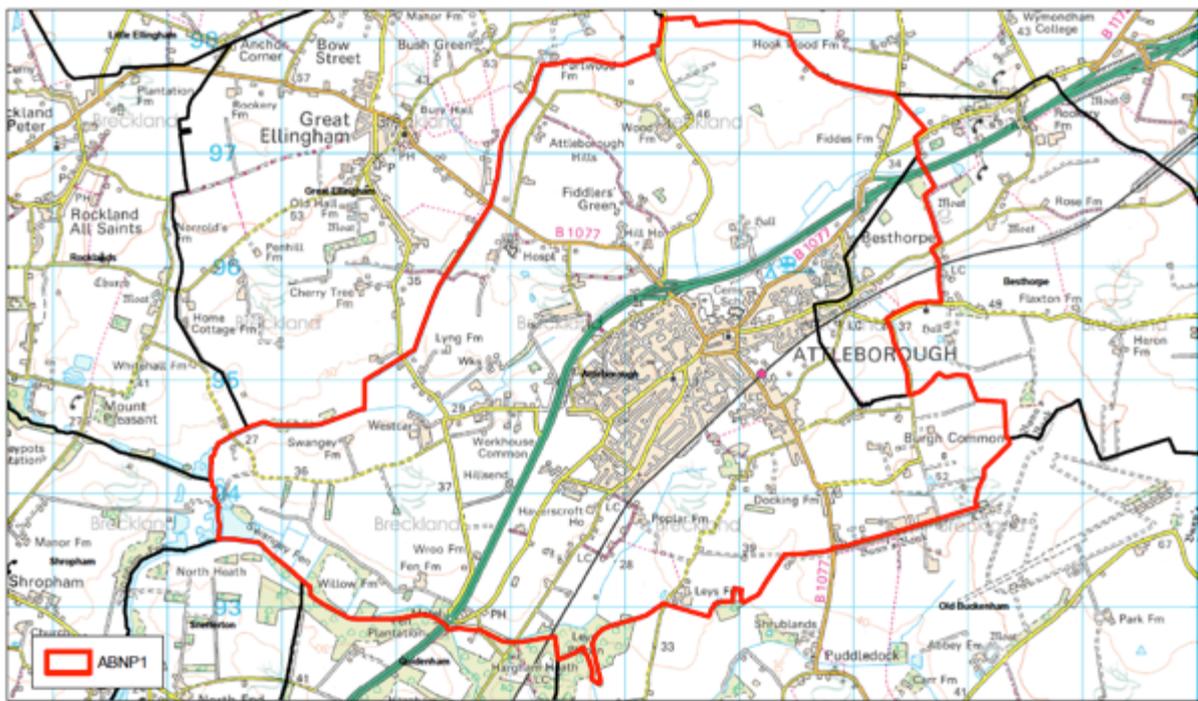
CO	SA Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
CO 1								Green	Green		Green		Green	Green	Green		Green	Green	Green
CO2	Green			Green					Green	Green	Green						Green	Green	Green
CO3	Red										Green			Green	Green			Green	Green
CO4														Green	Green		Green	Green	Green
CO5					Green						Green				Green	Green	Green		
CO6	Red	Amber	Amber	Amber	Amber	Amber	Amber				Green			Green	Green	Green			
CO7	Red	Amber	Amber	Amber	Amber	Amber			Amber		Green			Green	Green				
CO8											Green		Green	Green	Green				

CO9																				
CO10																				
CO11																				

**Key to assessment tables**

	Green: positive impact
	Amber: These impacts are a type that could go either way: mitigate
	Red: negative irreversible land loss due to lack of sufficient brownfield options

**Map ANP1 ANP Designated Area**



**ANP Designated Area: Map ANP1 BC 2013**

**7. Appraising Neighbourhood Plan Options**

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

7.2 This stage was undertaken, as strategic policies, for housing and employment allocations in the BC Core Strategy. Attleborough was assigned as a growth area for 4,000 homes. The ANP is compliant so it accepts the housing, but requires adequate and timely infrastructure to be put in place. No housing allocations are made in the ANP as this process is being undertaken by BC in parallel as the new Local Plan emerges.

7.3 In looking at the options, the ANPSG 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, and they also then considered policies for each Theme, and consulted on them. Each Theme is introduced below. In addition a Group was formed to manage the strategy for communicating the ANP.

<b>Groups</b>	<b>Theme Topic</b>
<b>Theme 1</b>	Local Economy
<b>Theme 2</b>	Housing
<b>Theme 3</b>	Transport & Communications
<b>Theme 4</b>	Education & Learning
<b>Theme 5</b>	Health & Social Care
<b>Theme 6</b>	Sports, Leisure & Community Facilities
<b>Theme 7</b>	Environment, Sustainability & Design

### **Theme 1 Local Economy - options**

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 newly revitalised Attleborough & Snetterton Business Forum, who accepted by them as good options. They then went onto the Attleborough Town Council web site as part of the ANP consultation process. However, since then one site has been allocated to educational use, one has planning permission for a firm consolidating its operations to Attleborough from several other parts of Norfolk, who is now in the process of site construction, 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, in an area first

shown as an option in the Autumn 2015 ANP consultation. The extent of the site was adjusted during the consultation in Summer 2016, and landowners for the Site A now being put forward all consent to its inclusion, and it should be noted that these sites were subjected to Sustainability Appraisal for employment use as part of the BC site options work. “The emerging Local Plan policy PD12 Attleborough Local Employment - based on the findings of a local Employment Growth Study, Settlement Fringe Study and Landscape Character Assessment and focusing on gateway locations into the town rather than relying on NPPF to guide employment locations, means the local economic and landscape preservation elements of sustainability are better served.” From page 10, paragraph 1.33 of *Breckland Local Plan SA Preferred Directions Consultation Version*. December 2015.

### **Theme 2 Housing – options**

7.5 The ANP was not set up to explore different housing site allocation options. The emerging LP consultations took place in parallel and site options came through this process. There is, however, a housing need identified through the Health and Social Care Theme, set out in para 7.9 below, but the ANP has not pursued a site allocation, leaving this to a purpose-designed Trust partnership to deliver.

### **Theme 3 Transport & Communications - options**

7.6 The ANP was not set up to explore different transport site allocation options, as the work on the Link Road and town centre traffic management improvements is being undertaken by NCC. The ANPSG is liaising with BC and NCC, and the ANP delivery strategy is to continue to work in partnership, especially on delivering a parking strategy. However in discussion on sustainable travel options a need to also liaise with bus and rail companies emerged, and options for a transport hub at the rail station are still under discussion. The ANP would not offer a suitable delivery mechanism.

### **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 debates on option. However in 2014 - 2015 the ANP Education 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. An option to rebuild the Attleborough Academy elsewhere was rejected as there was no likelihood of the necessary 25 million pound funds being available to deliver a new secondary school building, so it would be an unviable policy.

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

7.8 Health provision expansion was identified early as another key ANP priority. The GP partnership currently operates from two sites, and is seeking a single site facility in order to grow to meet the needs of the expanding town population. Therefore site options were explored in the Theme Group and reported in a commissioned consultants' study by the GP practice. 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, as it will be centrally located, is near to the station, and to the recreation ground so the surgery can promote well being and exercise activities for patients.

7.9 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 desire to offer integrated health and social care and accommodation has led to a refined brief, based on a model of provision delivered elsewhere in Norfolk, and the Theme Group visited an example in Aylsford. 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. A second GP surgery, and a Dementia Care facility could be included as part of the site. Though deliverable, this is still under negotiation, and the fall back option would be to seek an alternative site within the Strategic Urban Extension (SUE) growth area designated by BC. The masterplan and delivery of the SUE is sufficiently long term that the ANP does not specify this option in detail: the delivery mechanism proposed is to continue to work closely with BC and the SUE promoters.

## **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 Breckland's previous Local Plans in the last quarter of the 20th century, noted and documented by the Attleborough Heritage Group, are still not rectified). The Sports Theme Group commissioned *Options Appraisal for Sport and Leisure Facilities* February 2015. The *BC Open Spaces Parish Schedule 2015* lists key statistics for Attleborough on page 10. Even leaving aside the informal recreation for all ages, the Outdoor Sports area is 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 Indoor sports provision options were also considered in the consultants' report commissioned by the Sports Theme 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 a site available and insufficient likelihood of funding for this option to be pursued. At the consultation in the summer 2016, there was concern about swimming in particular, as the nearest facilities in Wymondham and Thetford would themselves come under increased use pressure as their populations grow. The response from the Greater Norwich Development Partnership was: “We are aware of local concerns regarding the capacity of facilities in nearby Wymondham that may be worsened by increased growth not only in Wymondham itself, but also in Attleborough and some of the Local Service Centres. It is therefore important that the need for and supply of indoor sports facilities is addressed in the Breckland Local Plan, working with South Norfolk to discuss the potential impact of cross boundary use of existing facilities.” We understand that BC is now working on a district-wide study of needs.

7.13 A preferred Outdoor Sports Facility option emerged in the Sports Theme Group in which Gaymer’s Fields, with an essential extension, would accommodate all formal outdoor sports pitches, including those currently using the Recreation Ground such as the Football Club. 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 for parents and children to meet and socialise could be created in a refurbished/re-provided venue in what is now the Football Pavilion building. However during the consultation in summer 2016 the owner of the proposed extension site declined to take the site forward, so two alternative sites for outdoor sports, both of which are outside the EA flood risk zones 2 & 3, would be offered by Attleborough Land Ltd, as shown on the Policies Map 1 as site D extensions.

## **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. BC could not support this, suggesting only that a policy would need to apply to the whole District as required under the Government’s new Technical Standards. Instead, the ANP is seeking a policy for independent design review for major sites, and Building for Life dialogue on housing. These would apply to developers of large sites of 50 or more homes, or sites in sensitive locations such as in the conservation area and the setting of listed buildings, in an effort to raise the quality of the urban design and

placemaking in the town. The option to apply this to all major developments (10 homes or over) was considered too onerous financially in consultations with developers.

7.15 Local Open Spaces are designated both in the maps for Attleborough of the Core Strategy, and in the emerging Local Plan, with an evidence base in *Open Spaces Parish Schedule 2015*. However the ATC are in discussions with the Norfolk Wildlife Trust to acquire Decoy Common, which is a wildlife haven and could also become a Local Green Space with the protection this would afford it into the long-term future, i.e. longer than the ANP or LP time horizon of 2036. Gaymer's Field also needs the protection of being designated as a Local Green Space. The Core Strategy set out an Open Space allocation that was lost because BC were unable to secure it through S106 negotiations, so an option giving added long term security is designating the additional Outdoor Hub fields as Local Green Spaces, as the Football Club move could take a decade or two to implement in full, and needs long term land use security to raise funding against. This is justified as it is a well-used space serving the whole community, in easy reach as the town expands south of the rail line, and will be linked by foot and cycle paths to the proposed Linear Park, and it needs the long term protection the designation would afford so the Outdoor Sports Hub could to be deliverable and retained as it expands, and to justify expenditure on the pitches and new pavilion even beyond 2036. The timetable to deliver the pavilion and to fully move formal recreation here may be towards the end of the ANP plan period.

7.16 An early draft of the ANP put forward five proposed Local Green Spaces, as they were not in the current LP draft. However if they go into the LP instead this would be an acceptable option. BC is of the view that the spaces already have adequate policy protection. We also have an ANP policy which means no trees to be demolished to make way for new homes, roads, or other reasons without adequate replacement meeting the ANP policies. Needing stronger recognition and protection are: the St Mary's churchyard with its trees, walls and green spaces; the trees in the Rectory garden and the chestnut avenue along Station Road; and Queen's Square.

7.17 The developer of the SUE, Attleborough Land, is engaged with the ANPSG in the process of defining a Linear Park through their land and more detail will emerge during the discussions of their masterplan. At their request the ANP Policies Map shows the concept indicatively and a more defined area will be drawn up in discussions on options with Attleborough Land and other developers.

7.18 BC comment that there should be heritage policy in the ANP, and Historic England make a similar comment. There is a heritage assets objective in the ANP: CO2. The BC Core Strategy and emerging Local Plan contain adequate heritage asset protection policy, as does the NPPF. What the ANP can bring is a more detailed evidence base. The evidence on the town's character and heritage undertaken by the Attleborough Heritage Group *Attleborough Neighbourhood Plan Character Assessment*, November 2015, is available together with a map giving the location of non-designated heritage assets Figure 2 at the end of this document. The assessment

also shows the need for “appropriate open space” and gives 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 that is recognised in the Environment Theme policies. A plan of the Conservation Area and TPOs in the more central area of the ANP is given below. There is little known archaeological evidence in Attleborough other than part of Bunn’s Bank ancient monument, and a standard clause is routinely used in development control to ensure archaeological sites are considered at the application stage, so no further ANP policy was considered necessary for historical or archaeological heritage assets.



**Attleborough Town Map with Conservation Area and TPOs** – source electronic communication from Hugh Coggles BC Tree Officer 14 October 2016 to ATC

## **8. Sustainability Appraisal of ANP policies compared with SA objectives**

## List of ANP Policies

Theme 1 The Local Economy	LE.P1 LE.P2 LE.P3 LE.P4 LE.P5 LE.P6
Theme 2 Housing	H.P1 H.P2 H.P3 H.P4
Theme 3 Transport and Communications	TC.P1 TC.P2 TC.P3
Theme 4 Education and Learning	ED.P1
Theme 5 Health and Social Care	HSC.P1 HSC.P2
Theme 6 Sports, Leisure and Community Facilities	SLC.P1 SLC.P2 SLC.P3 SLC.P4 SLC.P5 SLC.P6 SLC.P9SLC.P7 SLC.P8
Theme 7 Environment Sustainability and Design	ESD.P1 ESD.P2 ESD.P3 ESD.P4 ESD.P5 ESD.P6

Note SA objectives are set out in para 6.4 above.

### 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	Orange	Green	Green	Green	Green	Orange	Orange	Orange	Green	Green	Green	Green	Green	Green	Orange	Orange	Green	Green
LE.P2	Green	Red	Green	Green	Green	Green	Orange	Orange	Orange	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green
LE.P3	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green							
LE.P4	Green	Orange	Orange	Orange	Green	Green	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Orange	Green
LE.P5	Green	Orange	Orange	Green	Green	Green	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green
LE.P6	Green	Orange	Orange	Green	Green	Green	Orange	Orange	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. The site allocation design criteria suggest the setting to the

listed building is respected, and the water management should ensure no adverse effect on the aquifer or on streams serving the Swangey Fen SAC.

### Housing policies

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

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 and social aspects.

### Transport Policies

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

8.3 The developers and the LEP will to 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 **intention** to connect across the rail line that severs the town from the urban extension will help promote cycling provision and **designs** 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. The

parking strategy would help the town centre vibrancy as there would be more opportunities for shoppers to park. 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																				

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 option 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	
HSC. P1																				
HSC. P2																				

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																			
SLC. P2																			
SLC. P3																			
SLC. P4																			

<b>SLC-P5</b>																			
<b>SLC-P6</b>																			
<b>SLC-P7</b>																			
<b>SLC-P8</b>																			

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**

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

8.7 The policies demonstrate sustainable credentials.

Regarding water management again no additional policy was considered to be necessary. The new Government Technical Standards system will comprise new

additional optional Building Regulations on water and access, and a new national space standard (“the new national technical standards”). EA’s Letter to ATC of 17 August 2017, quoted at the end of this document, is essentially giving advice directed at the developer. Policies appear in other documents, and during the planning application process the NCC role to advise on SuDS should ensure this water management and waste recommendation is passed on, so there is no need for the ANP to repeat them.

8.9 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 the employment land allocation proposal adds a suggested location to the requirement for 10 ha in the Core Strategy, and the SEA below is in response to the decision from BC that it is required.

8.10 The policy LE.P1 seeks at least 10 hectares so jobs and homes can be in a broad balance, but the sites on London Road, including recent permissions, total at least 17 hectares, and the layout requirements on those given permissions do allow 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.

8.11. The purpose of the ANP, which covers a 20-year period from 2016 to 2036, 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 influencing 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.

8.14 The Core Strategy requires 10 ha of employment land to be allocated, the ANP consultation revealed an interest in having sites to expand into the immediate future and therefore suggested the allocation could not be part of the SUE or extending Bunn’s Bank, both of which require a link road to be at all sustainable. Other sites came forward to planning during the evolution of the ANP: Victory Park and a site to its south. In a meeting on 9 March 2016 about the other sites on London Road being used for employment, the following was stated: “Richard Smith (NPS, acting for NCC) confirmed there had been interest in the County Council’s land for employment use. However, it was intended that any change of use of the land would be considered through a planning application as this could be delivered quicker than through the Local Plan process”. Victory Park is being developed by Carters, and the ANPSG

stated that it “is supportive of the plans: it has a good design, and ANPSG would seek that this is followed on the NCC London Road site, with medium size businesses, not “sheds” and good designs as it will be on the gateway into Attleborough.”



Illustration of Victory Park 2.8 ha new employment site on London Road – Source: R G Carter planning application Design Statement, masterplan updated in 2016. Note landscape strip facing London Road and hedge retained.

A wider strip and innovative sustainable materials on the facades visible from London Road will be required for the ANP LE.P1 site allocation, as it is signalling a green gateway to the town, near a listed building, and the landscape will form part of the attractiveness to higher skill employers.

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## Part 2: SEA for site A



Photo: View of White Lodge PH from London Road, the employment site is on left side of the road, trees on the road give a green gateway appearance.

### **Employment Land SEA/ SA Scoping Response**

#### ***ANP Statutory Consultation responses***

9.1 BC confirmed in March 2016 the need for a Strategic Environmental Assessment (SEA) due to the draft policy seeking an additional allocation for employment use. The response from Historic England, reproduced at the end of this document, was: “Whilst we are pleased to see the assessment of the impact upon the setting of the White Lodge Public House, along with the outline proposals for mitigation, the analysis of the impact upon the setting of this listed building should be expanded upon.” The SEA focuses on the impact on the setting of the White Lodge Public House from the proposed employment site. Details of the listing are given in pages 34-35. The criteria for developing site A are set out in the updated ANP policy LE.P1, which has been expanded as follows:

#### **Policy LE. P1**

**Support allocation of a minimum of 10 ha site (site A on Policies Map 1) on London Road**

**Support proposals for a business park for SME-sized employment users, in use classes B1 and B2, with access from London Road, subject to the following criteria:**

- **Would not have significant harmful impacts on the surrounding landscape and the wider setting of the town and makes a positive contribution to biodiversity, conserves existing landscape features of merit, and includes new landscaping of a quality that enhances this location on the edge of Attleborough**
- **Access would be from London Road, parking managed, and the scope for a bus stop, and for cycle and pedestrian access would be explored**
- **HGV traffic generation would not have an unacceptable traffic impact on the wider town and the capacity and operation of its highway network, and traffic movements into the town centre are mimimised**
- **No detrimental impact on surface water run-off in the town's surface water catchment area, or entirely self-sufficient in its ability to manage surface water run-off, and no impact on underlying aquifer**
- **Provides new employment space to serve the needs of modern businesses, in particular small to medium enterprises, with parkland setting, high quality buildings and landscaping and control on maximum eaves height**
- **Preserves or enhances the setting of the listed White Lodge public house on London Road. This is likely to be achieved through high quality landscape on the access entrance and along the site's London Road boundary.**
- **Seek to create a wildlife corridor along the site boundaries, possibly linking to the Hargham Woods area on the other side of London Road.**

***Screening Opinion details***

9.2 The request for a screening opinion was made in November 2015. The response was received on 16 March 2016 in a document entitled *Strategic Environmental Assessment and Habitats Regulation Assessment*. The screening opinion received from BC stated in Para 4.11: "An SEA scoping report should be incorporated with the SA and accompany the Attleborough Neighbourhood Plan". The ANP Policy LE.P1 seeks at least 10 hectares to contribute to the objective that jobs and homes can be in a better balance, which can be fulfilled on site A shown in the ANP Policies Map 1, allowing for very generous landscaping. BC's *Attleborough Neighbourhood Plan Habitat Regulations Assessment - Screening Report* dated September 2016 considered the Regulation14 draft ANP and stated that a Habitats Regulation Assessment will not be required.

***Economic Evidence relating to employment land***

9.3 The *Attleborough – Potential Impact of 4,000 Additional Homes* report by Public and Economic Consultations (PACEC) for BC November 2008 Para 2.2.19 page 6

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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 commissioned The *ANP Employment Land Policy Case* October 2016 from Roger Morfe, Core Connections as an additional evidence base on the local economy. 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>).

### ***Emerging Local Plan policy and evidence base***

9.4 Whilst the ANP cannot use policies in the emerging Local Plan, the evidence base for the emerging Local Plan can legitimately be used to inform the Neighbourhood Plan. 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:

9.4.1 **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 Air Quality Management Area (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.

9.4.2 **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 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'

9.4.3 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.

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

## 10. Site description

10.1 The site is on London Road close to the A11 roundabout, and near to Breckland Lodge. It is on the opposite side of London Road to the listed White Lodge PH. The setting of this public house is relevant to making the employment site allocation. The way development respects the setting would be evidence required by the policy LE.P1 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. Requirements to retain existing hedges and mature trees wherever possible, and requiring an enhanced landscape with adequate SUDS strategy would also offer additional biodiversity opportunities.

10.2 During ANP consultation on the three parcels of land in the area of search for a new employment allocation, the landowner of the northern parcel of land informed the ANPSG that he does not wish it to go forward, and it is now removed from the site allocated as site A. Written consent was received by ANPSG for the remaining site A land shown in the ANP Policies Map 1.

10.3 The site is 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

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the A11, which have no public access, no access roads and are separated from the proposed site allocation by the A11.

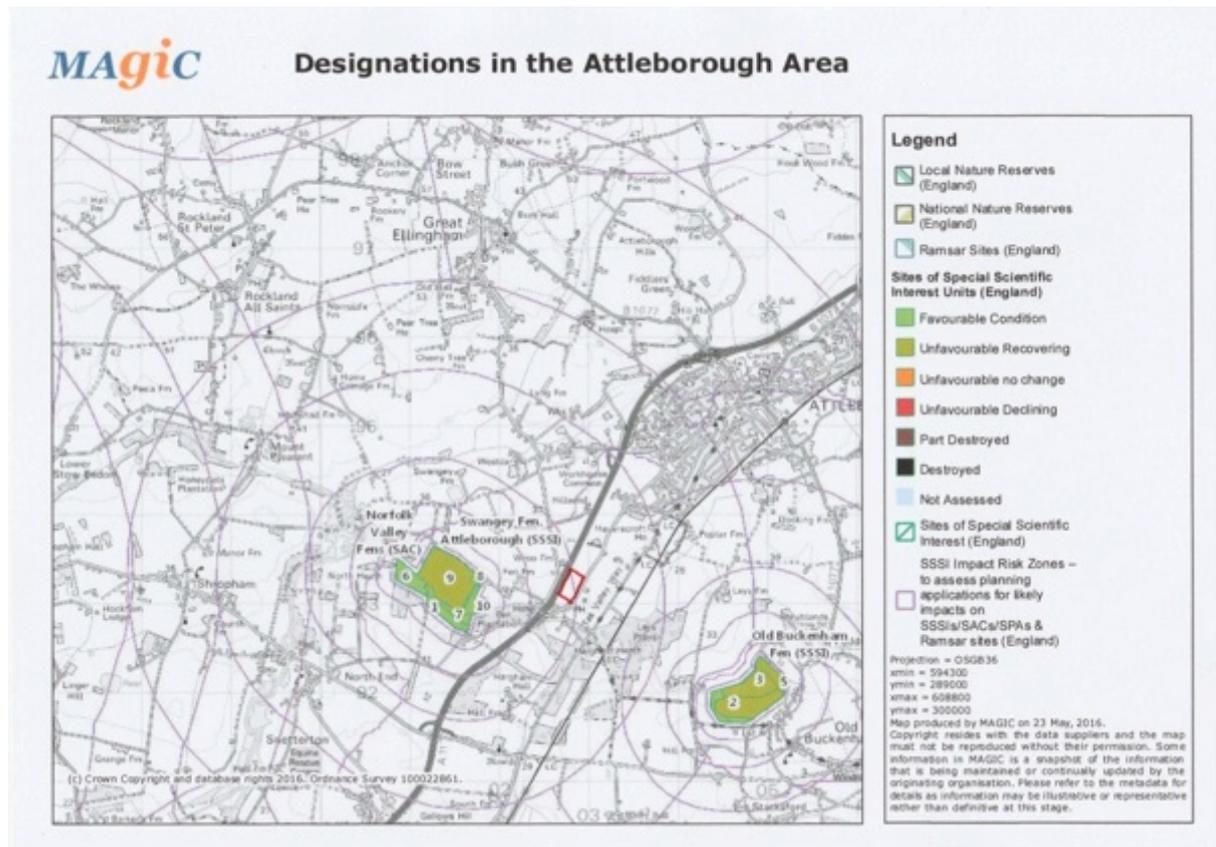
10.4 The location of this SSSI is shown in Figure 1. The site is a species-rich, spring-fed fen of a type that is mostly restricted to East Anglia. Wet woodland and grassland surround the fen and the River Thet flows through it. The site forms part of the Norfolk Valley Fens SAC, a disconnected network 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.

10.5 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 other designated nature conservation sites within 1km of the proposed employment allocation, but there are one SSSI and five County Wildlife Sites within 2km. At distances of over 1km there is no realistic potential for the proposed development to impact on sites. The Old Buckenham Fen SSSI is about 1 km to the east beyond Hargham Woods and the rail line. The ANP refers in its reasoned justification for 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 European sites or on the more distant designated habitats in the Brecks.

10.6 The 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), to the south: large semi-natural and plantation woodland and old heathland
- Woodland in Hargham CWS, to the south: mature, broadleaved woodland.
- Hargham Heath CWS, to the south: a birch, oak, hazel and ash woodland
- Fen Plantation CWS, to the south-west: alder carr and mixed woodland
- Tollgate Plantation CWS, to the south: blocks of broadleaved woodland and an area of mixed plantation.

Figure 1



Note the employment allocation is only approximately indicated in red on this plan.

## 11. The SEA Options Analysis

### 11.1 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 in discussions different sites were originally considered. The subsequent two years have seen the change in circumstances so that two of the sites that were originally identified now have takers who put in planning applications in 2016: the Norfolk firm Carters to relocate and expand on Victory Park, and Eastern Attachments on an adjoining site, whilst 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 two of the three Local Plan option sites described above in para 9.4, 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**

11.2 The preferred option is option 4, to designate a site consisting of land in a cluster near to the A11 junction and close to the indicative location for new SUE Link Road roundabout on London Road, 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 would serve new businesses.

## **12 Habitats Regulation Assessment**

12.1 These BC Local Plan Habitats Assessment statements are relevant:

The site developer will need to have regard to water management as part of meeting existing planning policy.

“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.)

“8.1 The Preferred Options document identified a number of new roads and road improvement requirements associated with the proposed growth. These included the new Attleborough link road to serve the proposed sustainable urban extension, improvements to the A47, junction improvements to serve the Thetford sustainable urban extension and it was also noted that with the promotion of A11 corridor development there may also be additional junctions and slip-roads.

Assessment for Preferred Site Options and Settlement Boundaries

8.4 No new roads or road infrastructure is set out in any detail within the Preferred Site Options and Settlement Boundaries. As such no additional concerns are identified beyond those identified in the previous HRA at Preferred Directions.” (Page 34 of *HRA Breckland Local Plan Part 1 - Preferred Site Options and Settlement Boundaries* Footprint Ecology 18 September 2016)

12.2 As part of the BC screening opinion the statutory consultees gave advice, on the basis of which the view overall on the ANP was:

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 ANP 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.

*Strategic Environmental Assessment and Habitats Regulation Assessment Screening Determination* March 2016 BC

12.3 In the screening assessment of the emerging ANP policies set out in the pre-submission draft Neighbourhood Plan, it was concluded that there were no effects that would necessitate the production of a full Habitat Regulations Assessment.

4.1. The assessment suggests that there are likely to be no significant negative effects on the European Designated Sites resulting from the Policies detailed within the draft Attleborough Neighbourhood Plan.

4.2 Therefore, based on the submitted draft, a full Habitat Regulations Assessment is

not required.

Natural England sent their views to BC on 13 September 2016.

From: Page 19 *Attleborough Neighbourhood Plan Habitat Regulations Assessment – Screening Report* September 2016.

### 13 Archaeology and Historic Buildings in vicinity of the Site Allocation

13.1. Archaeological records are shown below. However the ANP is not advocating any policies that would affect this area – this is within the Attleborough land site.

#### Bunns Bank

**NHER Number:** 57492

**Type of record:** Monument

**Name:** Earthworks of bank and ditch possibly related to Bunn's Bank (NHER 9206)

#### Summary

Earthworks of two sections of bank and a ditch possibly related to Bunn's Bank (NHER 9206) are visible on aerial photographs on land to the east of Leys Lane, Attleborough. It is difficult to be certain whether these earthworks are in fact related to this monument, or whether they are simply the remains of medieval to post medieval field division.

**Grid Reference:** TM 0484 9348

**Map Sheet:** TM09SW

**Parish:** ATTLEBOROUGH, BRECKLAND, NORFOLK

**Map:** [Show location on GoogleMaps](#)

#### Monument Type(s)

- BANK (EARTHWORK) (Unknown date)
- BOUNDARY MARKER (Unknown date)
- BOUNDARY MARKER (Early Saxon - 411 AD? to 650 AD?)
- BOUNDARY MARKER (Medieval - 1066 AD? to 1539 AD?)
- FIELD BOUNDARY (Medieval to Post Medieval - 1066 AD? to 1900 AD?)

### Full description

December 2012. Norfolk NMP. Earthworks of two sections of bank and a ditch possibly related to Bunn's Bank (NHER 9206) are visible on aerial photographs (S1) on land to the east of Leys Lane, Attleborough. It is difficult to be certain whether these earthworks are in fact related to this monument, or whether they are simply the remains of medieval to post medieval field division. The bank stretches from TM 0499 9346 to TM 0469 9350 and measures between 3m and 11m in width. E. Ford (NMP), 11 December 2012.

### Sources and further reading

<S1> Vertical Aerial Photograph: RAF. 1947. RAF CPE/UK/1918 3160-1 09-JAN-1947 (NMR).

### Related records

[9206](#) Part of: Bunn's Bank (Monument)

13.2. Historic Building records are given below for the building on the east side of London Road close to the proposed site allocation for development of a B1 business park on the west side of London Road. A green roadside buffer landscape strip is proposed to take swales and native planting to ensure the green gateway feel of this entrance to Attleborough. Criteria in policy LE.P1 have been amended to take account of the setting for this building.

### White Lodge Inn, London Road

**NHER Number:** 44501

**Type of record:** Building

**Name:** White Lodge Inn, London Road

### Summary

This public house was built about 1700. It is timber framed and rendered and has one storey, an attic and a thatched roof. Inside is a late 18th century fireplace.

**Grid Reference:** TM 02769 92960

**Map Sheet:** TM09SW

**Parish:** ATTLEBOROUGH, BRECKLAND, NORFOLK

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**Monument Type(s)**

- INN (Post Medieval to Modern - 1700 AD to 2050 AD)

**Protected Status**

- Listed Building

**Full description**

Public House. About 1700. Timber framed and rendered. Thatched roof. One storey and attic. Two 20th century porches and two-, three- or 4-light casements with glazing bars. Four eyebrow dormers with rounded casements. Southeast end is 20th century with two further 20th century extensions to rear. Interior has late 18th century fireplace, otherwise original timbering removed.

A. Cattermole (NLA) 9 May 2006.

**Sources and further reading**

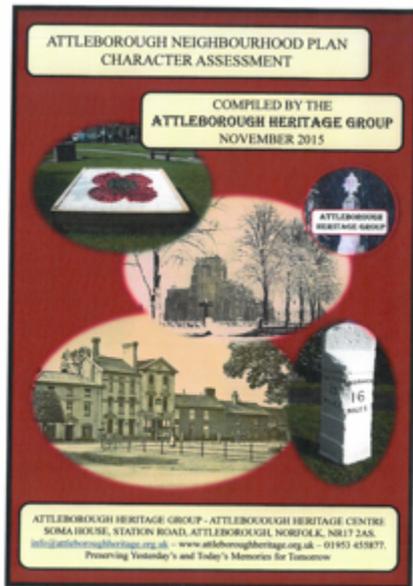
--- Scheduling record: English Heritage. List of Buildings of Historical and Architectural Interest.

---

13.3 The initial response from Historic England to the draft SA/SEA suggests more work is needed on the setting, and this is addressed below. The letter also refers to consultation on the draft ANP. However a section on heritage assets policy was considered not to be necessary as there are adequate policies in the emerging Local Plan and in the current development plan for protecting and enhancing the historic environment for the whole town and the community does not suggest any policy is needed to add to them. Our design policies make reference to respecting the character of Attleborough, and the AHG Character Assessment and additional maps give additional background on heritage assets and character assessment of a local nature.

13.4 The ANP allocates an employment site on London Road, Site A on the ANP Policies Map 1, with criteria for developing the site in policy LE.P1. However, the ANP suggests that the approach to the town and by the listed White Lodge is a sensitive location, which merits a Design Brief giving some more detail than in the ANP, although the form, design and quantum of development can only be determined with the submission of a detailed planning application. The justification for using natural materials and a high design standard is: Setting to a listed building & gateway to Attleborough. A draft development strategy is under preparation.

13.5 The ANP also refers to the *ANP Character Assessment* November 2015 carried out by the Attleborough Heritage Group. To complete the work as suggested in consultation, a map showing the location of the list of non-designated heritage assets was also compiled, which is given in this report below.



Cover – report available on request as a separate pdf.

*Attleborough Neighbourhood Plan Character Assessment* Attleborough Heritage Group November 2015

## **ATTLEBOROUGH HERITAGE GROUP**

### **LISTINGS IN THE ATTLEBOROUGH CONSERVATION AREA**

	<b>AHG NO.</b>	<b>PARISH</b>	<b>LIST REF.</b>	<b>GRADE</b>	<b>ADDRESS</b>
1	1A	ATTLEBOROUGH	84/11/10005	2	1 & 2 PROSPECT AVENUE,
2	1B	ATTLEBOROUGH	11/16	2	BUSH HOUSE, (A. E. Bush) QUEEN'S SQUARE,
3	1C	ATTLEBOROUGH	84/3/10011	2	AROSA, LONDON ROAD,
4	1D	ATTLEBOROUGH	11/20	2	OBELISK, STATION ROAD/CONNAUGHT ROAD,
5	1E	ATTLEBOROUGH	11/15	2	CYPRUS HOUSE, QUEEN'S SQUARE,
6	1F	ATTLEBOROUGH	11/18	2	TOWN HALL, (The Doric Restaurant) QUEEN'S SQUARE
7	1G	ATTLEBOROUGH	11/12	2	Formerly F & T. King Antiques, HIGH STREET
8	1H	ATTLEBOROUGH	11/2	2	THE GRIFFIN HOTEL, CHURCH STREET,
9	1J	ATTLEBOROUGH	11/4	2	CONNAUGHT ROAD
10	1K	ATTLEBOROUGH	1401582	2	RAILWAY STATION BUILDINGS, STATION ROAD.
11	1L	ATTLEBOROUGH	11/10004	2	LUSHER'S COTTAGE, ASH TREE CLOSE,
12	1M	ATTLEBOROUGH	11/19	2	1 BANK COTTAGE, QUEEN'S SQUARE
13	1N	ATTLEBOROUGH	84/11/10012	2	THE OLD BEAR INN, QUEEN'S ROAD
14	1P	ATTLEBOROUGH	11/1	1	ST. MARY'S CHURCH, CHURCH STREET
15	1Q	ATTLEBOROUGH	11/3	2	NUTS & BOLTS & HARVEY'S DRY CLEANERS Former Stebbings & Cockings, CHURCH STREET
16	1R	ATTLEBOROUGH	11/5	2	THE THATCHED COTTAGE, CONNAUGHT ROAD,
17	1S	ATTLEBOROUGH	11/14	2	TOWN PUMP, QUEEN'S SQUARE
18	1T	ATTLEBOROUGH	11/17	2	THE WHITE HOUSE, QUEEN'S SQUARE

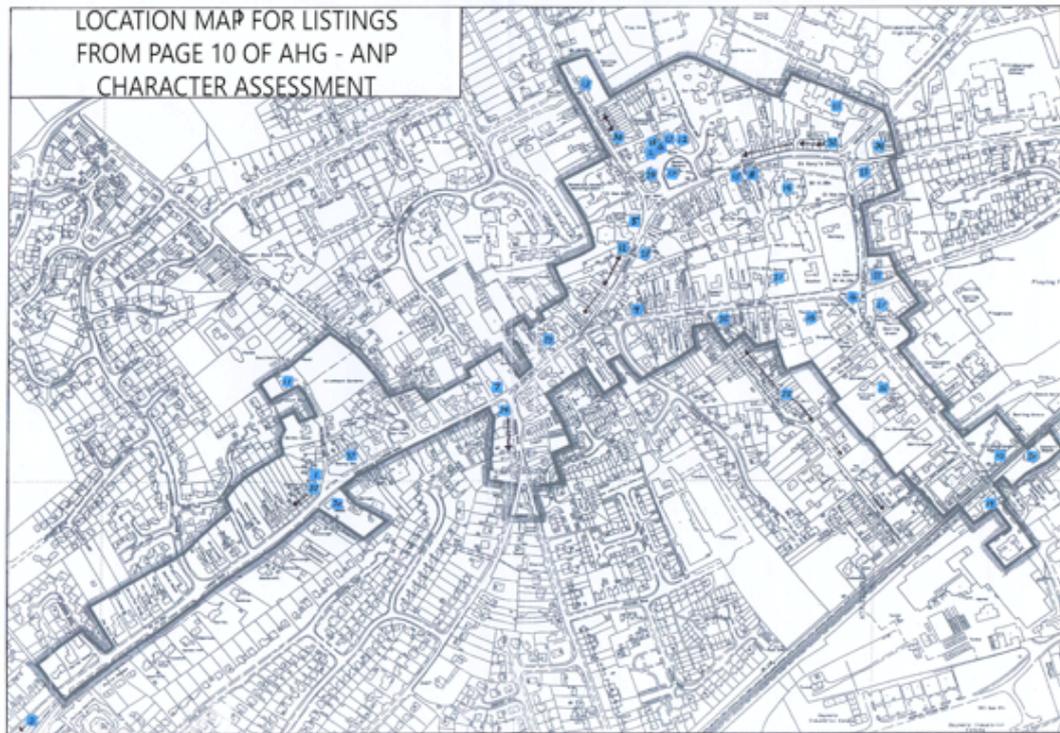
### **AHG NON LISTED BUILDINGS OF IMPORTANCE WITHIN THE CONSERVATION AREA**

19	BANHAM POULTRY LTD.	STATION	ROAD	FORMER GAYMER'S OFFICES
20	NCC GROUND WORKS	STATION	ROAD	FORMER RAILWAY GOODS SHED
21	THE MULBERRY TREE	STATION	ROAD	FORMER ROYAL HOTEL
22	1 & 2 COURT LODGE	SURROGATE	STREET	FORMER POLICE STATION
23	POINT COTTAGE	BESTHORPE	ROAD	
24	POINT HOUSE	BESTHORPE	ROAD	
25	ATT. PRIMARY SCHOOL	NORWICH	ROAD	FORMER BOARD SCHOOL
26	WEYCOT	QUEEN'S	SQUARE	FORMER FIRE ENGINE HOUSE
27	BARCLAY'S BANK	QUEEN'S	SQUARE	
28	HERITAGE SPICE/MYHILLS	EXCHANGE	STREET	FORMER CORN HALL/CINEMA
29	POST OFFICE	HIGH	STREET	
30	ACRE HOUSE	LONDON	ROAD	
31	LIBRARY	CONNAUGHT	ROAD	

### **AREAS OF IMPORTANCE**

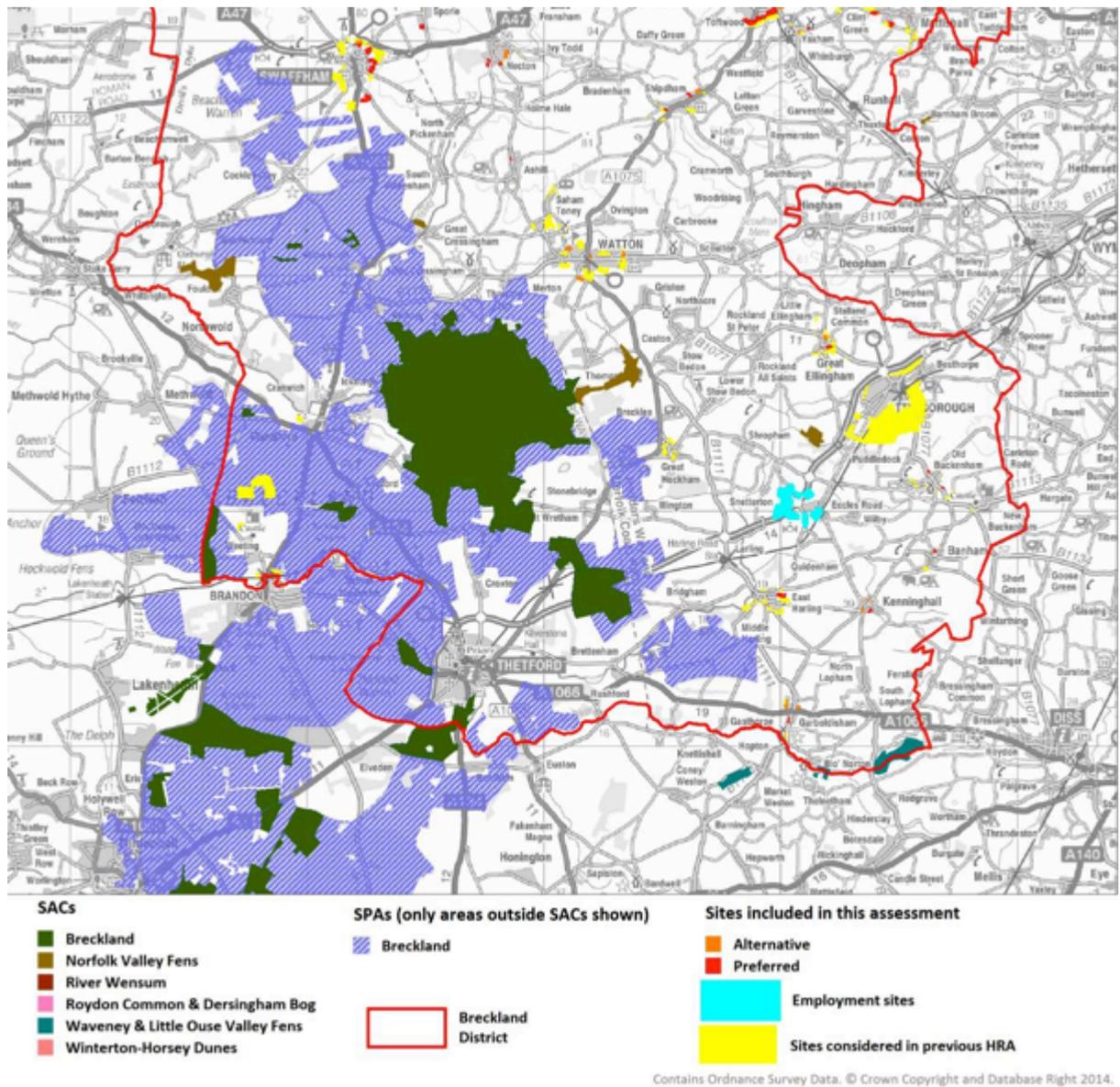
32	SHOP FRONTAGE AREAS FROM CHURCH STREET TO LONDON ROAD
33	NORTH OF LONDON ROAD FROM WHITE HORSE LANE TO ST. EDMUND'S GATE
34	WEST SIDE OF HARGHAM ROAD FROM HIGH STREET TO JUNCTION WITH LEYS LANE
35	1870 - 1900 VICTORIAN DEVELOPMENT STATION ROAD, CONNAUGHT ROAD AND NEW NORTH ROAD
36	VICTORIA TERRACE AND DRILL HALL QUEEN'S ROAD
37	CHERRY ROW, LONDON ROAD

Key to location map taken from listings from page 10 of AHG – ANP CHARACTER ASSMENT.



**Figure 2** Map of Heritage Assets listed in the *Attleborough Neighbourhood Plan Character Assessment* Attleborough Heritage Group November 2015.

**Figure 3** European site designations in Breckland and the emerging Local Plan housing growth areas, taken from *Breckland HRA Preferred Sites & Settlements* 18 September 2016, page 23 Map 2. The Swangey Fen SAC in Figure 1 is an isolated part of the Norfolk Valley Fens SAC.



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### **13.6 Statutory Consultee response Natural England to BC re the HRA screening Report**

Copied from ANP Habitat Regulations Assessment – Screening Report September 2016 Appendix 5

From: Plan Cons Area Team (Norfolk, Suffolk) (NE)  
[mailto:PlanConsAreaTeamNorfolkSuffolk@naturalengland.org.uk]  
Sent: 13 September 2016 14:55  
To: Heinrich, Susan <Susan.Heinrich@breckland.gov.uk> Subject: 195480  
Attleborough Neighbourhood Plan HRA (Breckland DC)

Dear Susan

Thank you for consulting Natural England on the Habitats Regulations Screening Report for the Attleborough Neighbourhood Plan. I can confirm that we agree with the conclusions of the HRA report and do not consider that the report requires any amendments.

Kind regards

Francesca

Francesca Shapland

Lead Adviser, Planning & Conservation

Norfolk & Suffolk Team

Tel: 0208 0265792

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

**13.7 Letters from Statutory Consultees re Screening Opinion for an SA/ SEA**  
are reproduced here:

- i) EA letter 26 February 2016 to BC (Capita)
- ii) Historic England 3 March 2016 to BC (Capita)



**Mr Iain Withington**  
Breckland Council  
Elizabeth House Walpole Loke  
Dereham  
Norfolk  
NR19 1EE

**Our ref:** AC/2016/124105/01-L01  
**Your ref:** email dated 11/02/16  
**Date:** 26 February 2016

Dear Mr Withington

**ATTLEBOROUGH NEIGHBOURHOOD PLAN REQUEST FOR SCREENING  
OPINION ELIZABETH HOUSE WALPOLE LOKE, DEREHAM, NORFOLK, NR19  
1EE.**

Thank you for consulting us on the request for screening opinion for Attleborough Neighbourhood Plan.

It is our view that a Strategic Environmental Assessment would be required for the Neighbourhood Plan.

According to the National Planning Policy Framework (NPPF) Practice Guidance, paragraph 46; a strategic environmental assessment may be required for a neighbourhood plan which allocates sites for development. In this case, the Plan is proposing to allocate an additional employment site (which is neither allocated in the adopted local plan nor the emerging plan). Therefore, there is need for the Plan to ascertain the likely significant environmental effects (including cumulative effects) that have not already been considered and dealt with through a sustainability appraisal of the local plan.

The site is located above a Principal Aquifer, Water Framework Directive (WFD) groundwater body, and is close to the river Thet. It is also close to a proposed Strategic Urban Extension. The site is considered to be of high sensitivity and could present potential pollutant/contaminant linkages to controlled waters.

According to the NPPF, the planning system should contribute to and enhance the natural and local environment by minimising the adverse effects on the local area.

Environment Agency  
Bromholme Lane, Brampton, Huntingdon, PE28 4NE.  
Customer services line: 08708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)  
Cont/d..



Iain Withington Esq.  
Planning Policy Team leader  
Breckland Council  
Elizabeth House  
Walpole Loke  
Dereham  
NR19 1EE

Our ref: 2016 02 29  
Attleborough  
NP Screening.  
Telephone 01223 582775  
3<sup>rd</sup> March 2016

By email only to: [Iain.Withington@capita.co.uk](mailto:Iain.Withington@capita.co.uk)

Dear Mr Withington

**Strategic Environmental Assessment for the Attleborough Neighbourhood Plan – Screening Opinion.**

Thank you for email dated 11<sup>th</sup> February 2016 and submission of papers dated November 2015 received from Attleborough Town Council Neighbourhood Plan 'request for a screening opinion'.

For the purposes of this consultation, Historic England will confine our advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage. Our comments are based on the information supplied in the email attachments, including the Attleborough Town Council Neighbourhood Plan 'request for a screening opinion'. It is for the Council to make the final decision in terms of whether SEA is required.

From our reading of the SEA Screening Opinion it would appear that the Neighbourhood Plan focuses on both conformity with the Sustainability Appraisal undertaken for the emerging Breckland Local Plan (see paragraph 1.6) and the creation of environmental policy objectives (see the summary section at paragraph 10).

Historic England notes that this Neighbourhood Plan seeks to allocate employment land (at paragraph 1.7 and 8.2). At page 13 the screening opinion seeks *(iii) An opinion on the need to carry out an SEA/SA on the proposed policy to designate further employment land so jobs and homes can be in balance for the plan period to 2036, and for an area of search for this additional employment land designation to be on the London Road, close to the A11 corridor. The exact size would be subject to study and discussions with all parties. The principle to be adopted is that if for 2,000 jobs and 4000 homes to meet the Core Strategy, the Wimpey site on London Road was considered adequate, for jobs to balance 4,000 homes, an area roughly double this size could be required. This is illustrated in the map above.*



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



On this basis it appears the case that the Attleborough Neighbourhood Plan proposes an additional employment allocation beyond the emerging Breckland Local Plan and therefore proposes to allocate land.

If the Neighbourhood Plan does propose an allocation itself or policies likely to have an impact on the historic environment then a SEA will be required to evaluate the impact upon the historic environment. Historic England have formed this view as we are unable to assess if such an allocation will result in a significant environmental effect because a specific site is not identified.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations, 'CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT' [Annex II of 'SEA' Directive], and the assessment duties in the Regulations Part 2 (5)(6), Historic England would take the view that an SEA is only required in respect of land allocation for additional employment land and not for the environmental policy objectives.

The views of other statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made. I would be pleased if you can send a copy of the determination as required by Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise in the Neighbourhood Plan where we consider that, despite the absence of SA/SEA, these would have an adverse effect upon the historic environment.

We hope that the above comments are of assistance.

Yours sincerely



**Michael Stubbs**  
Historic Environment Planning Adviser  
e-mail: [Michael.Stubbs@HistoricEngland.org.uk](mailto:Michael.Stubbs@HistoricEngland.org.uk)



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Correspondence or information which you send us may therefore become publicly available.



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## 13.8 Statutory Consultee follow up letters to ATC from Regulation 14 ANP and SA/SEA (HRA) consultation:

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### Sarah | Attleborough Town Council

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**From:** Steven.King@HistoricEngland.org.uk  
**Sent:** 24 November 2016 09:28  
**To:** Sarah | Attleborough Town Council  
**Cc:** Steven.King@HistoricEngland.org.uk  
**Subject:** Historic England advice on case PL00047684  
**Attachments:** \_HERef\_PL00047684\_L274823.doc

Dear Ms Watts

I am writing to notify you of the following Places module case:

SEA/SA/IIA: Strategic Environmental Assessment/ Sustainability Appraisal/ Integrated Impact Assessment  
Attleborough Neighbourhood Plan Sustainability Appraisal Report, Attleborough Town Council, Attleborough,  
Breckland District, Norfolk [Case Ref. PL00047684; HE File Ref. HD/P 5316; Your Reference. ]

Please find attached the response of HE

Yours Sincerely

Steven King  
Historic Places Advisor  
E-mail: [Steven.King@HistoricEngland.org.uk](mailto:Steven.King@HistoricEngland.org.uk)  
Direct Dial: 01223 582717



Historic England

EAST OF ENGLAND OFFICE

Ms Sarah Watts  
Attleborough Town Council  
Town Hall  
Queens Square  
Attleborough  
Norfolk  
NR17 2AF

Direct Dial: 01223 582717

Our ref: PL00047684

24 November 2016

Dear Ms Watts

**Attleborough Sustainability Appraisal Report  
ANP REG 14 Sustainability Assessment and SEA**

Thank you for your email dated 27 October 2016 and the attached Sustainability and Strategic Environmental Assessment Draft for Attleborough Neighbourhood Plan Draft Regulation 14. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage. .

Breckland District Council confirmed the need for a SEA Scoping Report due to the draft policy seeking an additional allocation for employment use. Section 13.4 of your Strategic Environmental Assessment focuses on the impact of the setting of the White Lodge Public House from the proposed employment site. Whilst we are pleased to see the assessment of the impact upon the setting of the White Lodge Public House, along with the outline proposals for mitigation, the analysis of the impact upon the setting of this listed building should be expanded upon. Advice on this subject is provided in *'The Setting of Heritage Assets; Historic Environment Good Practice Advice in Planning: 3 July 2015,*

We would also refer you to our comments made on the Draft Plan earlier in November 2016, in which we made comments on the impact upon the cultural heritage of Attleborough by the proposed neighbourhood plan. We are disappointed to see that despite some encouraging policies within the Neighbourhood Plan, there is little reference to them in the Sustainability Appraisal. Both the SA and the Neighbourhood Plan would be strengthened with the inclusion of a Historic Environment Sub Section.

Finally we should like to stress that this opinion is based on the information provided by the Attleborough Town Council of in your email dated 27 October. To avoid any doubt, this does not reflect our obligation to provide further advice on or potentially, object to specific proposals which may subsequently arise in the Neighbourhood Plan where we consider these would have an adverse effect upon the historic environment or any further amendments to the Environmental Report.

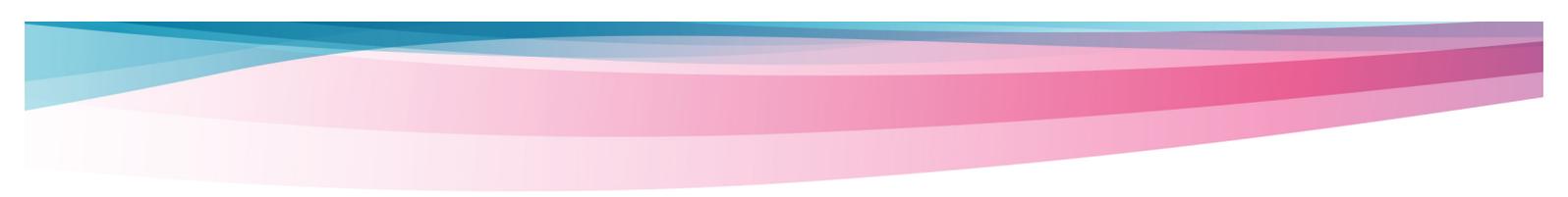


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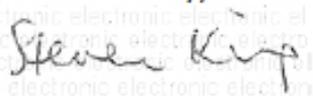
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We hope this letter is of use. Please let me know if you have any queries.

Yours sincerely,



**Steven King**  
Historic Places Advisor  
Steven.King@HistoricEngland.org.uk

Letter to ANPSG chair dated 14 November 2017



Historic England

EAST OF ENGLAND OFFICE

Mr Tony Perkins  
Attleborough Neighbourhood Plan Steering  
Group  
Town Hall  
Queens Square  
Attleborough  
Norfolk  
NR17 2AF

Direct Dial: 01223 582717

Our ref: PL00036895

14 November 2016

Dear Mr Perkins

**Draft Neighbourhood Plan Regulation 14 Consultation, Attleborough, Norfolk**

Thank you for inviting Historic England to comment on the Consultation Draft of your Neighbourhood Plan. Please accept our apologies for the delay in response. I have now had the opportunity to review the plan and offer the following advice.

I note that we have also been recently consulted on the Sustainability Assessment and Strategic Environmental Assessment Draft, and our response should be with you shortly. Given your reference to the Attleborough Neighbourhood Plan Character Assessment (November 2015); it would have also been helpful to have submitted this too. I have not been able to identify where on your website this is available to read.

As set out in my previous letter of March 2016, Historic England is primarily concerned with the historic environment and I note that Attleborough contains a significant number of designated heritage assets including one grade 1 listed building, 2 grade II\* listed buildings, and 30 grade II listed buildings and a conservation area. For clarity it would be preferable to include the boundaries of the conservation area on the Proposals Map.

Given this number of heritage assets I am pleased to see that the historic environment is mentioned in a number of locations, and the plan contains measures to protect aspects of the historic environment which are included within a number of objective and policies within the Plan. The inclusion and awareness of locally significance is also welcome.

However, it would have been preferable to have gathered these together in an overall



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section on the historic environment. I am concerned that there is no mention of Archaeology in the draft Plan; other than the passing reference to Bunns Bank. It may be that a specific section titled Historic Built Environment/Archaeology could form a section within Theme 7 Environment, Sustainability and Design. Other objectives such as HDP13 Promoting Renovation might then also be moved or mentioned within the same section.

Theme 2 deals with housing, with Objective H1 in particular dealing with the SUE Growth Area, an allocation of land for 4,000 new residential units, together with new link road. The setting of several listed buildings may be affected by this proposal and, we would expect to see an explicit expectation in the Policy that the settings to any listed buildings would be respected.

Policy ESD.P1 of Theme 7 proposes a strategy for green infrastructure in part for a proposed linear park running from the new link road serving the SUE area to the north east of the Attleborough Settlement Boundary. Whilst this linear park is to be welcomed, the park will be located near to listed buildings. We would recommend that a sentence is added to the criteria for acceptable design confirming that the settings to these listed buildings would be respected.

Theme 1 deals with the Local Economy; Policy LE.P5 seeks to change the primary retail frontages within the town to allow both sides of Exchange Street to fall into prime frontage, as well as the retail units on Queens Road opposite the car park and Lidl. Unfortunately we cannot see in your information submitted a town centre insert. Both roads are in the conservation area, and the northern side of Queens Road in particular still has a strong residential character, created in part by a long terrace of early 20<sup>th</sup> century houses, and a double fronted 19<sup>th</sup> century detached residence. Towards Queens Square there are also 4 to 5 retail units. The existing houses to the northern side of Queens Road contribute positively to the Attleborough Conservation Area, and this policy should make it clearer that this relates only to secondary and primary frontages, not the change of use from residential to retail.

Policy LE.2P seeks to redevelop the Queens Square Car Park for uses that support town centre retail and other community uses. Whilst the principle of this may be acceptable, this site is within the heart of the conservation area and adjacent or in close proximity to several listed buildings. I would recommend that these constraints are incorporated into the policy and any resultant brief.



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Again, were a Historic Built Environment sub-section to be created within an Environment section, then a new policy could be drafted to sit within the sub-section to cover all of the matters highlighted above.

Finally, we are aware that Breckland District Council is in the process of updating their local plan with adoption proposed for 2017. We note that you make reference to Policy DC17 of the existing local plans and other policies that may replace it in the future.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made then please do get back to me. In the meantime we look forward to continuing to work with you and your colleagues.

Yours sincerely,

Steven King  
Historic Places Advisor  
Steven.King@HistoricEngland.org.uk



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**Sarah | Attleborough Town Council**

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**From:** Mugova, Elizabeth <elizabeth.mugova@environment-agency.gov.uk>  
**Sent:** 22 November 2016 10:59  
**To:** Sarah | Attleborough Town Council  
**Subject:** RE: Attleborough Scoping Report

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Reg 16

Sarah

Thank you for consulting us on the Attleborough Scoping report. We have no further comments to add to our previous letter dated 17 August 2016, our ref: AC/2016/124830/01.

If you have any further queries please do not hesitate to contact us.

Kind regards  
Elizabeth

Elizabeth Mugova  
Sustainable Places Advisor  
Sustainable Places Team  
East Anglia Area

Direct Dial: 020 3025 5999  
Email: [elizabeth.mugova@environment-agency.gov.uk](mailto:elizabeth.mugova@environment-agency.gov.uk)



**From:** Sarah | Attleborough Town Council [<mailto:sarah@attleboroughtc.org.uk>]  
**Sent:** 07 November 2016 09:12  
**To:** Mugova, Elizabeth <[elizabeth.mugova@environment-agency.gov.uk](mailto:elizabeth.mugova@environment-agency.gov.uk)>  
**Subject:** Attleborough Scoping Report

Dear Elizabeth Mugova

Please be advised, the date for the end of the consultation period is the 28<sup>th</sup> November not as previously mentioned the 25<sup>th</sup> November.



**Sarah Watts**  
Attleborough Town Council  
Town Hall Queens Square  
Attleborough  
Norfolk  
NR17 2AF

**Our ref:** AC/2016/124830/01-L01  
**Your ref:** Regulation 14 Consultation  
**Date:** 17 August 2016

Dear Ms Watts

**ATTLEBOROUGH NEIGHBOURHOOD PLAN REGULATION 14 DRAFT TOWN HALL QUEENS SQUARE ATTLEBOROUGH NORFOLK NR17 2AF**

Thank you for consulting us on the Attleborough Neighbourhood Plan Regulation 14 Draft dated July 2016.

We have reviewed the Plan and our comments are set out below.

We support the Draft Neighbourhood Plan; particularly the following two objectives:

- **CO 9** – To promote all new buildings to incorporate the highest standards of design, new build methodology, materials and energy saving techniques
- **CO 10** - To protect and enhance the natural environment, including additional high quality open space

The draft Plan has given reasonable consideration to the following key environmental issues:

- water quality
- flood risk
- the need to protect and enhance the environment
- reference to key environmental evidence base

We welcome the following policies:

- Objective ESD4 – Improve water environment, fisheries, river quality and reduce flood risk
- Objective ESD 5 – Protect existing landscape features: trees, plants, streams, ponds and rivers.

Environment Agency  
Bromholme Lane, Brampton, Huntingdon, PE28 4NE.  
Customer services line: 08708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

Cont/d..

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The draft Plan is in line with National Policy which encourages the need to minimise pollution and other adverse impacts on the local and natural environment.

We welcome the objective to protect and enhance surface and groundwater bodies. Any activities should not cause deterioration in the status of the River Thet, or prevent it from reaching 'Good status', which is the overarching objective of the Water Framework Directive.

#### **Sustainable Urban Drainage**

We welcome the proposal to use Sustainable Drainage Systems (SuDS) for new developments. Any new SuDS should be constructed in such a way that they do not present an increased risk to groundwater and the wider water environment. Please refer to our Groundwater Protection: Principles and Practice (GP3) at <https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3>.

Norfolk County Council as the Lead Local Flood Authority should be consulted on SuDS proposals.

#### **Contamination**

Any land affected by contamination should be subject to adequate assessment, investigation and remediation as may be necessary for the protection of the water environment prior to redevelopment. The requirements of the Environment Agency Guiding Principles for Land Contamination should be followed during any brownfield land redevelopment projects.

#### **Waste water and water supply**

Waste water treatment and the potable water supply for this area is managed by Anglian Water. Early consultation with them is recommended to establish if they have capacity to meet the demands of any future development in the area.

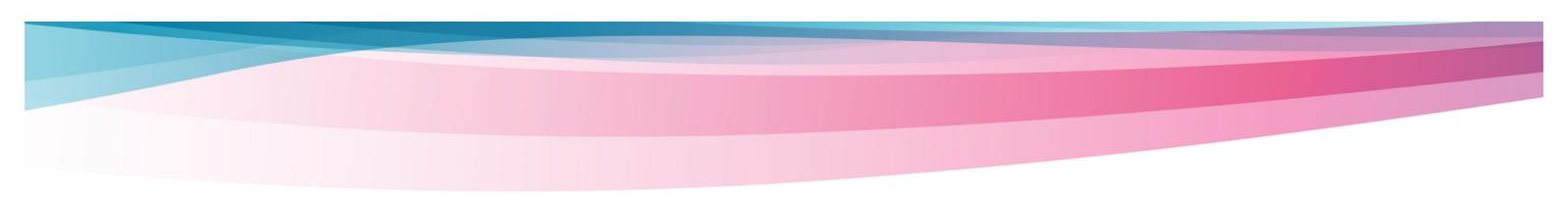
Any future development must be connected to the mains sewerage system.

The interaction of development planning and water resource management is a key issue for this region, and there are three key elements to consider namely;

- **Development should not be committed ahead of secure water supplies**  
Attleborough lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. The planners should seek advice from the water company to find out whether this is the case, or whether a new source needs to be developed or a new abstraction licence is sought. The Agency may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.
- **The location of development should take into consideration the relative availability of existing developed water resources**  
The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.
- **Every opportunity should be taken to build water efficiency into new developments, and innovative approaches should be encouraged**

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The Environment Agency supports all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and I would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. The Environment Agency also supports the idea of greywater recycling as it has the potential to reduce water consumption in the average household by up to 35%. This must, however, be achieved in a safe and hygienic manner.

### **Waste Planning**

Any future development should consider the waste hierarchy and the promotion of waste prevention measures. It would be helpful if the development incorporates a Materials Management Plan, so opportunities for waste minimisation, reuse and recycling are realised at the earliest stage.

Please refer to guidance on Construction Code of Practice for the Sustainable use of Soils on Construction Sites at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69308/pb13298-code-of-practice-090910.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69308/pb13298-code-of-practice-090910.pdf)

There is further guidance on sustainable construction available on the Waste and Resources Action Programme website; [www.wrap.org.uk](http://www.wrap.org.uk)

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

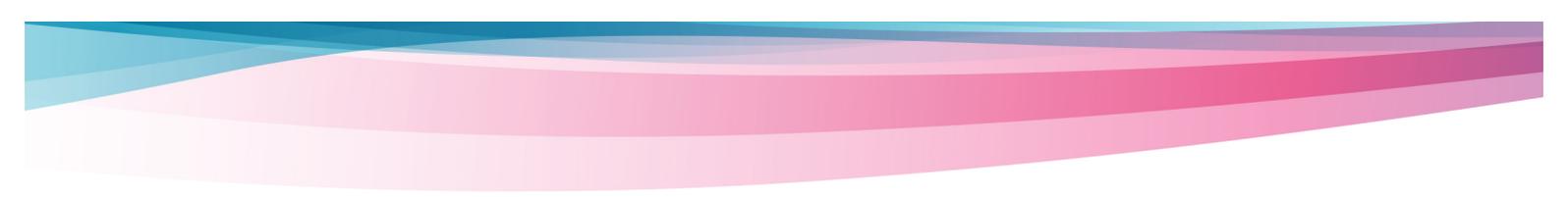
Yours faithfully

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