

**Breckland Local Plan**

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**HEARING STATEMENT**

**Matter 14 Strategic Urban Extensions –  
Attleborough**

**Issue 14.1 to 14.10**

**Prepared by: John Long for**

**Attleborough Land Ltd**

**23 March 2018**

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## 1 Introduction

- 1.1 Attleborough Land Ltd is the organisation responsible for promoting strategic land to the South of Attleborough on behalf of Landowners. The land being promoted forms the majority of the Attleborough Strategic Urban Extension (SUE) (Policy Gen 4 – Development Requirements of Attleborough Strategic Urban Extension).
- 1.2 Attleborough Land Ltd have been involved in the SUE for almost 10 years and have promoted it through the Breckland Core Strategy (Adopted 2009); the emerging Neighbourhood plan; and this Local Plan. Attleborough Land Ltd commenced its community engagement process in early 2010, following the Core Strategy's adoption and it continues today. Attleborough Land Ltd continue to meet regularly with the Town Council and continue to be a board member of the Attleborough Development Partnership
- 1.3 Attleborough Land Ltd submitted an Outline Planning Application for the SUE in July 2017, which was registered by the Council in early August 2017. At the time of writing this Local Plan Hearing Statement (March 2018), the application is progressing towards revisions and then determination, estimated to be early summer 2018.

## 2 Response to Inspector's Issues

### **14.1 Is the projected site delivery trajectory (commencement 2019/20) realistic?**

- 2.1 The current (July 2017) delivery trajectory is included in Appendix 1 of this Statement. It suggests the first delivery of units in 2020. This assumed that consent would be issued in early spring 2018. However, because of the need for revisions to the submitted, planning application (ref: 2017/0996/O), the most likely date for the planning consent is summer 2018. This still leaves over 2 years for the site (or the first phase(s) of the site) to be sold; the first reserved matters to be submitted and approved, pre-commencement conditions to be discharged (on a phase by phase basis) and commencement to occur.
- 2.2 It is accepted that achieving the delivery of 60 units by the end of 2020 will be a challenge, taking into account the need to revise the planning application. Although the expectation is that some units will be built/under construction by the end of 2020. The scheme's development period is likely to be subject to a number of economic cycles, so predicting an accurate trajectory throughout the period is difficult. However, whilst ambitious, it is considered achievable. At its peak, 200 units per year is suggested, this is on the assumption that there are 3-4 developers on site, producing around 50-65 units each per year.

- 2.3 To help achieve this timescale, work on the S106 legal agreement has started and it is intended that this will be formally signed shortly after the site secures a Resolution to Grant Planning Consent. Discussions are also underway with Homes England (previously the HCA) regarding the provision of a loan to help deliver the new spine road. Securing this funding will significantly help the cash-flow of the development, particularly in the early phases.
- 2.4 Discussions/negotiations will continue with Breckland's Planning Officers to ensure that any planning consent's conditions can be delivered on a phase by phase basis and that any pre-commencement conditions are limited to those that are considered essential.
- 2.5 The trajectory will be kept under review, and will be refreshed at key milestones in the process. The next key milestone following revisions will be the Planning Committee.

#### **14.2 What is the current status of the planning application submitted for the Attleborough SUE?**

- 2.6 Planning Application (ref: 2017/0996/O) was submitted to the Council in July 2017 and validated in early August 2017. The application has been subject to statutory and public consultation. A number of issues were raised during the consultation including by statutory consultees, such as Historic England, Highways England (HE), Norfolk County Council Highways; and Norfolk County Council (NCC) Lead Flood Risk Authority (LFRA); the Town and local Parish Councils, and the general public, which has required additional technical work to be commissioned, and will result in design changes.
- 2.7 Since the close of the planning application's consultation period, work has been taking place to seek to address the key issues raised. This has required additional technical and design work to be undertaken, and will require revisions to the planning application and supporting material, including the Environmental Impact Assessment.
- 2.8 At the time of writing (23 March), the hydraulic modelling work required to address issues raised by the LFRA is complete (subject to sign off by the LFRA), a meeting took place with the LFRA on 12 March to ensure the modelling work was in-line with LFRA expectations. The highway modelling work and junction design work to address issues raised by NCC Highways, Highways England and Caspah (the Hargham Road campaign) is complete (subject to sign off by NCC and the HE). A meeting is arranged with NCC and HE for the 27 March 2018, to sign off the work. The design work to address issues raised by Historic England is complete, subject to any minor changes as a result of the hydraulic modelling work. A meeting is due to be arranged with HE to discuss the design changes, once they have been finalised, which is anticipated by the end of March/early April.
- 2.9 The additional design and technical work will inform further considerations of the planning application's Environmental Impact Assessment. An Addendum to the application's Environmental Statement will be prepared and submitted to support and underpin the revisions to the planning application and take account of the design changes and new/updated technical work. The revisions are anticipated to be submitted to the Council and issued for further public consultation later in the spring 2018.

- 2.10 At the time of writing (23 March 2018) the planning application’s description is anticipated to remain as original submitted, and in summary is “Outline Planning Application (all matters reserved other than the principle means of access) for up to 4,000 homes, new Link Road, schools, local and neighbourhood centres, open space, infrastructure and off site town centre highway works (and demolition of unused buildings) on approximately 217 hectares of land to the South of Attleborough.
- 2.11 The anticipated timetable to determination is: ‘Sign off’ of additional modelling work by end of March/early April; design/parameter plan revisions and updating of technical work, including an Environmental Statement Addendum to take account of the planning application revisions by end of April/early May; submission of revisions early May; public and statutory consultation on revisions until early June; Planning Committee late June/early July (subject to consultation responses). S106 Planning Obligations will continue to run in parallel with completion and decision notice estimated to be issued late summer 2018 (subject to agreement on S106 matters).
- 2.12 More detail on the applications background is contained in Attleborough Land Ltd comments on the Breckland Local Plan Submission Version (September 2017). A further update can be provided at the Hearing session.

### **14.3 Is the Attleborough SUE based on a robust assessment of reasonable alternatives? Is it the most sustainable option?**

- 2.13 Attleborough Land Ltd considers that the Council has properly considered the reasonable alternatives, and agree that overall it is a sustainable option.
- 2.14 The Environment Impact Assessment submitted with the planning application has assessed the likely significant environmental effects of the Proposed Development of the Attleborough SUE. The assessment has been based upon a range of detailed technical reports and assessments with the Environmental Statement reporting the likelihood of significant environmental effects occurring during the construction and operational phases of the Proposed Development. It is anticipated that the mitigation measures identified will be implemented either through appropriate planning conditions or legal agreement.
- 2.15 Overall, the impacts remaining after the mitigation measures have been implemented range from major/moderate beneficial to, at worse, major adverse, however, the majority fall into the ‘negligible’ category.

### **14.4 Is the Attleborough SUE based on a sound understanding of infrastructure requirements?**

- 2.16 Attleborough Land Ltd are content that the SUE is based on a sound understanding of infrastructure requirements. The planning application process has provided further detail on the schemes infrastructure needs, timing and funding requirements. Attleborough Land Ltd have commissioned specialist advisors (Quantem) to provide a cost profile for the infrastructure. GTC, one of the UK’s leading infrastructure providers, are engaged to establish the programme for infrastructure/utility delivery, and explore opportunity for early phases to be built within existing capacity limits.

2.17 The scheme's infrastructure requirements, trigger points and costs are therefore known. Discussions are continuing with lending bodies, including Homes England and Norfolk County Council in respect of loan arrangements to potentially front fund key infrastructure. This could accelerate the delivery of key infrastructure such as the Link Road.

#### **14.5 Are the trigger points for the necessary infrastructure requirements based on sound evidence?**

2.18 The 2 key trigger points in the policy are the Link Road's delivery at 1,200 homes; and the Waste Water Treatment Works upgrade at 1,800 homes. In terms of the WWTW upgrade, Anglian Water in their response to the planning application have confirmed that the WWTW will have sufficient capacity to deal with the SUE. The WWTW upgrade trigger is therefore no longer necessary. It is accepted that the transmission network will need reinforcing and work is already underway to plan the new Foul Water route/pumping station to serve the site.

2.19 The trigger for the Link Road's completion, has also been agreed with Norfolk County Council and is based on sound technical evidence. A trigger is needed to ensure sufficient residential sales take place to provide the necessary funding for the Link Road. The Transport Assessment (TPA) submitted with the planning application confirms that 1,200 homes can be accommodated on the existing network before the Link Road needs to be completed, subject to certain town centre highways schemes being implemented, including 2-way traffic at Surrogate Street, removing on-street car parking in the town centre etc. The phasing strategy/trigger points for the Link Road and milestones for its delivery is included at Appendix 2 of this report. The necessary town centre works are programmed, funding is available (LEP Growth Fund), consultation has taken place, schemes have been designed and construction timescales established. The necessary town centre works will be completed before the first SUE occupations.

2.20 Should loan funding become available for the Link Road, the likelihood is that the road would commence immediately, potentially from both ends and most likely be completed before substantial numbers of units are occupied on the SUE. This could also help accelerate the delivery trajectory, as multiple outlets could be opened along the route of the road.

#### **14.6 Is Policy GEN 4 consistent with national policy, in terms of the historic environment?**

2.21 See comments below for the SUE's planning applications response to HE comments on the planning application.

#### **14.7 Can the Attleborough SUE be delivered without unacceptable harm to heritage assets?**

2.22 Historic England objected to the SUE planning application primarily on the basis of potential impacts on Bunns Bank Scheduled Ancient Monument. Since the objection was received, discussions have taken place with the project's heritage consultant and Historic England to understand the nature of the objection and advise on a strategy to overcome the objection. Following discussions, the planning application is proposed to be revised to remove residential development from the area of the SUE, adjacent to Bunns Bank, and also the area where Bunns Bank was thought to extend at the southern edge of the SUE and replace it with open space. The density of development/building heights closest to Bunns Bank have been reduced to help reduce impacts on the SUE. Once the full extent of the planning application's revisions has been confirmed, expected to be end of March 2018, further engagement with Historic England will take place prior to the revisions being submitted to the Council. The expectation is that the proposed changes will be sufficient to overcome Historic England's objection, in respect of Bunns Bank. An update can be provided at the Hearing session. The proposed changes also remove residential development from the small part of the SUE within Old Buckenham Parish Council.

#### **14.8 Can the Attleborough SUE be delivered without unacceptable harm to highway safety?**

2.23 The evidence submitted to support the planning application aims to demonstrate that the SUE can be delivered without unacceptable harm to highway safety. The submitted scheme will be revised to address particular highway related points, including the full severance of Hargham Road and to clarify the intervention needed at Breckland Lodge Roundabout. Discussions with NCC and Highways England are continuing to ensure the planning application revisions will address issues raised. An update can be provided at the Hearing session.

#### **14.9 Is there a need for Policy GEN 4 to refer to additional health care services to be effective?**

2.24 Provision can be made within the SUE for additional health care services to be located. The planning application seeks consent for D1 uses, which could include a health care facility. If 'off-site' health care facilities are necessary, this would be considered through the Section 106 discussions. At the time of writing this report, comments are awaited from the NHS on how to mitigate the scheme's health care impacts. An update can be provided at the Hearing session.

#### **14.10 What is the current status of the Attleborough Neighbourhood Plan? Are the two consistent?**

2.25 The Attleborough Neighbourhood Plan is adopted. It is noted that both the Neighbourhood Plan and the Local Plan show a different alignment of the Link Road, than that proposed in the planning application. The Planning Application's Link Road alignment is shown in Appendix 3 of this statement. The Planning Application's alignment has been agreed with both Breckland Council and Norfolk County Council. The Local Plan should be updated with the new Link Road alignment. The Neighbourhood Plan acknowledges that the Link Road alignment is subject to change. Attleborough Land Ltd are comfortable that the planning application is in general conformity with the Neighbourhood Plan.

### 3 Conclusions

- 3.1 Attleborough Land Ltd consider the Breckland Local Plan Policy GEN 4 to have been positively prepared, and that the strategy for Attleborough that will help meet the Town's housing needs and contribute to meeting the wider District's Housing Needs over the plan period.
- 3.2 The submitted planning application (ref: 2017/0996/O) for the SUE helps to demonstrate that the Strategy for the Attleborough SUE will be supported by necessary infrastructure, including the Link Road, Linear Park, Schools and utility upgrades etc. Additional technical work and revisions to the application are underway to address matters raised through the planning application consultation, some of which have been raised through the Local Plan consultation. This result will be a scheme that is in accordance with the Development Plan and is consistent with the aim of achieving sustainable development.
- 3.3 Attleborough Land Ltd request that other more detailed comments on matters such as design, building standards etc. submitted in response to the Breckland Local Plan Pre-Submission version are given due regard by the Inspector, but do not consider them to be matters requiring detailed discussion at the Hearing session.



# APPENDIX 1

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## Housing Trajectory

Timeline (Year)	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	TOTAL
<b>Housing Trajectory</b>																													
<b>Phase</b>																													
<b>Sub Phase</b>																													
Phase 1				20	30	30	30	30	30	30	30	30	30	30	30	30	30	30	50	50	50	50	47						687
Phase 2	a		20	30	30	30	30	30	30	30	30	30	30	30	30	30	15												395
		b	20	30	30	30	30	30	30	30	30	30	30	30	30	30	30	50	50	50	50	50	50	50	50	4			764
Phase 3	-						30	30	30	30	30	30	30	30	30	30	30	50	50	50	50	50	50	50	50	40	34		804
Phase 4	-							60	60	60	50	50	50	50	50	50	50	50	50	50	50	50	50	50	60	60	60	55	1125
Phase 5	-										30	30	30	30	30	30	30	15											225
<b>Total</b>				60	90	90	120	180	180	180	200	200	200	200	200	200	185	195	200	200	200	200	197	160	114	100	94	55	4000
<i>Cumulative</i>				60	150	240	360	540	720	900	1100	1300	1500	1700	1900	2100	2285	2480	2680	2880	3080	3280	3477	3637	3751	3851	3945	4000	

**Notes:**  
 Q1 Jan - Mar, Q2 Apr - Jun, Q3 Jul - Sep, Q4 Oct - Dec  
 The above table is for information purposes only. The dates may be subject to change.



## **APPENDIX 2**

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### Link Road Delivery Milestones

Attleborough SUE - Housing Delivery Trajectory and Indicative Highway Works Programme

Year (after planning permission is granted)

Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27		
Per year			60	90	90	120	180	180	180	200	200	200	200	200	200	185	195	200	200	200	200	197	160	114	100	94	55		
Year cumulative			60	150	240	360	540	720	900	1,100	1,300	1,500	1,700	1,900	2,100	2,285	2,480	2,680	2,880	3,080	3,280	3,477	3,637	3,751	3,851	3,945	4,000		
Phase			1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1							
			2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a	2a					
			2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b	2b				
					3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
						4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	
										5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	

Resolution to Grant

S106 Negotiations

Planning Permission Granted



Bristol  
Cambridge  
London  
Manchester  
Oxford  
Weylyn Garden City



25 Southampton Buildings  
London  
WC2A 1AL

020 3799 9405  
www.tpa.uk.com

- Norfolk County Council
- Network Rail
- Highways England

- ◆ Main milestones
- ◆ Adoption

Note - To be read in conjunction with TPA Technical Note 1409-42 TN14

## **APPENDIX 3**

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Indicative Masterplan as submitted with Planning  
Application 2017/0997/O

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Notes:  
 Do not scale from this drawing.  
 All contractors must visit the site and be responsible for taking and checking Dimensions.  
 All construction information should be taken from figured dimensions only.  
 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.  
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This drawing is for planning purposes only. It is not intended to be used for construction purposes. Whilst all reasonable efforts are used to ensure drawings are accurate, JTP accept no responsibility or liability for any reliance placed on, or use made of, this plan by anyone for purposes other than those stated above.

- Application boundary 217.10 Ha
- Existing buildings
- Existing roads
- Existing railway
- Existing watercourses
- Existing water bodies
- Proposed Link Road
- Proposed primary street and high street
- 30m corridor for proposed link road and primary route\*
- Proposed new bridges
- Proposed indicative secondary roads
- Indicative access points to residential parcels
- Proposed indicative footpaths
- Proposed indicative cycling network
- Development parcel 1 (Town Oaks) 44.59Ha
- Development parcel 2 (Poplar Meadows) 37.06Ha
- Development parcel 3 (Borough Lane) 22.80Ha
- Primary schools 5.60Ha
- Mixed use - Local centre 5.21Ha
- Mixed use - Neighbourhood centre 0.48Ha
- Public squares 0.24Ha
- Sport Pitches 14.71 Ha
- Allotments and community orchards 4.74 Ha
- Formal and informal children's play spaces 6.40 Ha
- Informal public open spaces 60.27 Ha
- Proposed SuDS attenuation basins 6.14 Ha
- Indicative area of reed bed
- Third party land
- Existing landfill site

NOTES  
 \*The alignment of the link road, high street and the primary route may deviate within the limits of the 30m corridor.

Rev	Date	Description	Drawn	Chkd

## OUTLINE PLANNING

Client  
 Attleborough Land Ltd and Landowners



Project  
 Attleborough

## Masterplan

Scale @ A1 1: 5000 Job Ref. 00203B  
 Drawing No. 00203B\_MP01 Revision P3  
 Scale Bar 0 50 100 150 200 250m  
 JHYQ CSM  
 JHYQ CSM  
 JHYQ ECC/CSM

P3 27.07.17 Amendments to site boundary  
 P2 26.06.17 Amendments to roads  
 P1 15.06.17 Submission For Outline Planning

