

Breckland Local Plan – Examination in Public

Statement of Common Ground

Policy GEN 04 Development Requirements of Attleborough Strategic Urban Extension

This Statement of Common Ground is an Agreement made between the following parties:

- Breckland District Council
- Historic England

1. Introduction

1.1. The purpose of this Statement of Common Ground (SoCG) is to identify areas of common ground and any remaining areas of uncommon ground in relation to the representations made by Historic England in response to policy GEN 04 OF Breckland District Council's Pre-Submission Local Plan.

2. Background

2.1. Historic England have commented at each stage of development of the Breckland Local Plan and have engaged with the Council over the production of the Historic Characterisation Study (2017) (LP/E/4) to ensure that the policies in the plan are informed by a considered understanding of the impact on the local historic environment. This has resulted in policies being subject to removal, adaptation or subject to additional mitigation clauses in the Pre-Submission Breckland Local Plan Publication (LP/S/1).

2.2. Historic England made a representation on the Pre-submission publication (1136480) which raised issues (amongst others) with the proposed policy wording for Attleborough GEN 04. Historic England recognise that the SUE is an important part of the region's housing allocation and accept the principle of the SUE but have serious concerns regarding the justification in terms of the historic environment to support the allocation. In the summary of their representation as to why the plan is considered unsound; Historic England states that there is insufficient evidence to support the SUE at Attleborough. What evidence there is, namely the 2017 Historic Characterisation Study, identifies the impact of development upon undesignated heritage assets as an issue a development scheme would need to address but this conclusion has not been translated into the policy. Specifically evidence is lacking to support the location of the link road and the policy wording itself does not adequately address the historic environment, in particular the nationally important archaeology of the site.

2.3. Historic England has also expressed a number of concerns with the outline planning application for Attleborough SUE (3PL/2017/0996/O), which is still being determined. This SoCG seeks only to address the representation and issues raised regarding local plan policy GEN 04.

2.4. The Council have sought to reach an understanding with Historic England over the issues raised, and amendments required in order to address their concerns. This statement identifies where areas of agreement have been reached including, where relevant, revised wording to policies and/or supporting text.

3. Proposed modifications to GEN 04 Development Requirements of Attleborough Strategic Urban Extension

3.1. Proposed policy GEN 04, in regard to the historic environment states: 'Any proposal will have to consider the findings of the Historic Characterisation Study and carry out further assessment work into the historic landscape to the south of Attleborough to the satisfaction of the Council and Historic England'.

3.2. Through discussion between the Council and Historic England it has been determined that modifications to policy GEN 04 are required in order to provide additional clarity, to ensure that development proposals adequately consider the historic environment, and to incorporate recommendations set out in the Historic Characterisation Study into the policy on Attleborough SUE.

3.3. The following modifications to policy GEN 04 are recommended for consideration by the Inspector by Historic England and Breckland District Council:

Modification 1

Reason for modification – To set out the wider context of the historic environment in the supporting text to justify proposed policy clauses relating to designated and non-designated heritage assets and the requirement for archaeological surveys.

Proposed modification –

Revise Attleborough section, paragraph 2.21 of the supporting text under heading 'Site Context and Constraints':

2.21 The Historic Characterisation Study identifies ~~limited~~ designated and non-designated heritage assets within and surrounding the boundary of the SUE and contains an analysis of the immediate and wider context of the site. Significant heritage assets include the Scheduled Ancient Monument (Bunns Bank) and the Grade II listed Besthorpe Hall. Of note, is the imposing linear earthwork of the Scheduled Monument of Bunn's Bank which runs close to the south eastern boundary of the site. Its significance relates to its survival as a well preserved earthwork and archaeological deposits which are of evidential and historic value. The Historic Characterisation Study highlights the likelihood that this continues inside the SUE boundary, therefore further archaeological investigation to the west of Bunn's Bank is required by the policy. Further designated heritage assets within or adjacent to the SUE include the Grade II listed Old Hall and Burgh Farm, Attleborough Conservation Area and Old Buckenham Conservation Area. The masterplan for the SUE should take consideration of these and other non-designated assets in the design and layout of the site.

2.22 If impact is unavoidable, the masterplan should outline adequate mitigation measures to the satisfaction of the Council in consultation with Historic England. Mitigation measures should be based on an assessment of the significance of designated and non-designated heritage assets and the findings of the Historic Characterisation Study and could include buffer areas of open space, landscaping, alterations to the layout and/or proposed densities in the vicinity of heritage assets, amongst other measures. A Heritage Asset Statement will be required to address the impact of development on the historic environment and ~~potential~~ additional surveys may be required following consultation with Historic England.

Modification 2

Reason for modification – To ensure the development requirements adequately address the significance of the historic environment and that this forms an integral consideration in the planning of Attleborough SUE.

Proposed modification -

Policy GEN 4, under Development requirements of Attleborough SUE, delete wording in the 5th paragraph and replace with the following text:

~~Any proposal will have to consider the findings of the Historic Characterisation Study and carry out further assessment work into the historic landscape to the south of Attleborough to the satisfaction of the Council and Historic England.~~

Development proposals for Attleborough SUE will conserve, and where possible, enhance the historic environment. The Historic Characterisation Study should inform an appropriate design response and any masterplanning exercise, including any mitigation measures. Development proposals must:

- Conserve, and where possible, enhance designated heritage assets and non designated heritage assets and their settings. Designated heritage assets include Bunn’s Bank Scheduled Monument, Grade II listed Old Hall and Burgh Farm, Attleborough Conservation Area and Old Buckenham Conservation Area
- Respect the rural nature of the site and the location of the site as a gateway from the south;
- Explore opportunities to create a pattern of development and open space which naturally aids the understanding and interpretation of the significance of heritage assets, in particular Bunn’s Bank Scheduled Monument;
- Retain and respond to important landscape features throughout the site;
- Be informed by archaeological surveys, where required, in line with policies ENV 07 and ENV 08, particularly the area to the west of Bunn’s Bank Scheduled Monument.

Modification 3

Reason for modification – To ensure that the masterplan is informed by a full understanding of the impact on the historic environment seeking to conserve and enhance designated and undesignated heritage assets.

Proposed modification -

GEN 04, Masterplan, add an additional point following criteria 15:

16. The Masterplan will be informed by the presence of designated and non-designated heritage assets and their settings, this will include an investigation of the archaeological significance of the site, particularly the area west of Bunn's Bank. Proposals for the siting of major infrastructure, such as the link road required to serve the development, or infrastructure upgrades to the existing town centre will be informed by an appraisal of the impact upon the historic environment.

4. Indicative location of Attleborough link road

4.1. Historic England do not dispute that a link road is required, but disagree with the indicative location for the proposed junction adjacent to Bunn's Bank (as shown in the Policies Map, Map 2.1 and Picture 6.1 in the plan). Historic England considers there is a lack of evidence to support the positioning of the road in the Local Plan. This is explained in the following statement by Historic England:

4.2. 'Considerable justification is required with regards to the position of the link road with a thorough analysis of the environmental impacts. The public benefits that might flow from the proposal would need to be over and above other solutions or route options. Only with that information in front of the Inspector do we consider it possible to approve a policy that implicitly or explicitly mentions the route or location of the link road. In short, this would most appropriately be done through a planning application, with a full Heritage Statement. A policy that implicitly or explicitly supports the location or route of the road, even indicatively, without information and justification would not accord with the Framework, and not be sound. We consider it to be more appropriate for the Local Plan to include reference to the need to resolve problems associated with the need to provide road infrastructure rather than highlighting a specific option as the resolution'.

4.3. The Council understands Historic England's concerns and agrees that further work is required to understand the impact of proposed development, including the link road, on the historic environment.

4.4. The Local Plan proposes that a strategic link road is required between London Road and the B1077 Attleborough Road, that this is a necessary piece of infrastructure to serve Attleborough SUE and shows an 'indicative' route based on evidence gathered to support the link road to inform the submission publication. To provide context, the evidence justifying the indicative location of the link road stems from the Attleborough Link Road Concept Options Report 2013 (LP/V/5) and preceding work and consultations which principally informed the development of the Core Strategy and preliminary work on the Attleborough and Snetterton Heath Area Action Plan (since discontinued).

- 4.5. The Council accepts that the Concept Options Report did not provide a thorough assessment of the historic environment, but it did consider other determining factors such as the environmental, engineering, economic and traffic advantages, disadvantages and constraints associated with different routes and schemes. From this, the indicative route was further considered through joint working with Norfolk County Council as Highways Authority in assessment of future traffic movements, highway safety and impact on the wider road network.
- 4.6. This background work justifies the use of this route as an indicative location for the link road in the Local Plan. However, the Council acknowledges that in forming this conclusion, due regard was not given to consideration of the impact of the proposed link road on the historic environment. To address this, the Council worked with Historic England in producing the Historic Characterisation Study (LP/E/4) which provides a strategic level of understanding about the impact of development proposals on the historic environment. To resolve Historic England's outstanding concerns, the Council seek to modify the policy (proposed modifications 1 – 3 in this SoCG) which will ensure that further work is undertaken as part of the planning application and masterplan. The Council also propose to ensure that all maps within the plan depict the road as indicative and therefore subject to change, depending on the outcome of further work which will be required to be undertaken in accordance with the proposed modifications to Policy GEN 04.
- 5. Proposed Minor Modifications with regard to references to Attleborough link road in the plan**
- 5.1. Policy GEN 04 does not specify the location of the link road or the specific junctions, only the two roads to which it links. As the policy wording does not set the specific location or junctions of the link road, it is not considered that changes to the wording about the link road are required. The proposed agreed amendments to the policy wording (particularly modification 3) will ensure the historic environment is given due consideration in the final positioning of the link road.
- 5.2. The indicative route presented on maps in the document is intended to be shown as indicative on all maps because further work is required through the planning application to determine the final positioning of the road. It is a 'best fit' according to the evidence which was available to inform the submission publication, but is subject to alteration and refinement through the planning application process.
- 5.3. The indicative route is shown in the Policies Map (LP/S/2) and two further maps within the plan itself: Map 2.1 Emerging Attleborough Neighbourhood Plan Policies Map and Picture 6.1 Summary of Attleborough Allocation, page 178. One of the maps require modifications to identify the route as 'indicative' as currently it could be misinterpreted to be a definitive location for the road.

- 5.4. The map key is misleading as it does not refer to the route as indicative. It is proposed that the key is changed to show the route as indicative and therefore consistent with other maps in the Local Plan. This will be included in the list of minor modifications.

Map 2.1 Emerging Attleborough Neighbourhood Plan Policies Map

- 5.5. The Council supported Attleborough Town Council in the production of the Attleborough Neighbourhood Plan which was made on 18th January 2018. The map was included as a reference point to show support for, and consistency with the Neighbourhood Plan. Since the Pre-Submission Publication was published, Attleborough Neighbourhood Plan has now been made and forms a part of the local statutory development plan for Breckland. The Council considers that the map serves an important purpose in showing that the Council support the wider policies in the Neighbourhood Plan and in illustrating the collective vision of the Town Council and residents, and the District Council in planning growth and infrastructure for the town.
- 5.6. The link road is marked in the key as indicative in Map 2.1 and therefore does not conflict with the strategic policy intention.
- 5.7. A minor modification is required to remove references to the emerging plan as it is now made. This will be put forward in a list of minor modifications to the plan.

Picture 6.1 Summary of Attleborough Allocation

- 5.8. This map depicts the proposed employment allocation for Attleborough. The map shows the boundary for the SUE and the link road, which is marked as indicative on the key for employment maps which is shown on the preceding page. As the road is marked as indicative, no changes are proposed to the map or key.
- 5.9. The title of the map does not reflect the content of the map and therefore a minor modification is required to the title of the map so that it states: Map – Attleborough Employment Allocation. This will be put forward in a list of minor modifications to the plan.

6. Conclusion

- 6.1. This Statement sets out the areas of agreement between Breckland District Council and Historic England with regard to policy GEN 04 Development Requirements of Attleborough Strategic Urban Extension (SUE). With regard to the areas of agreement, the Council have put forward proposed modifications to policy GEN 04 to ensure that clarification is provided regarding the requirements to ensure that development proposals for Attleborough SUE take full consideration of the historic environment including designated and non-designated heritage assets and that the route for the proposed link road is marked as 'indicative' throughout the plan.

7. Declaration

The content of this document is agreed between the undersigned for the purpose of the Breckland Local Plan Examination

Signed on behalf of Breckland District Council:

Signed on behalf of Historic England:

Executive Director of Commercialisation

Date: 19/3/2018

Principal Advisor, Historic England

Date: 20/03/2018