

These comments were made on the Draft Final Sustainability Appraisal

Name	Consultee type	Comment	Response	Recommendation
Ken Hamilton	Norfolk County Council.	However, with regard the Sustainability Appraisal, NLA should b updated to Historic Environment Service.	Agreed.	Correction made
Mike Meadows	Natural England.	In general, we agree with the assessment presented in the Sustainability Appraisal Report (SA). However, there are two areas where we believe the Sustainability Appraisal does not reflect the TAAP, and consequently presents the TAAP as scoring lower than it does in reality. The SA should include an assessment of the impact of the TAAP on biodiversity in general, rather than just biodiversity occurring on designated sites. For example, the TAAP (paragraph 7.10) identifies the area to the north of the A11 as important for <i>Ophonus laticollis</i> as one of the reasons for excluding this area from the TAAP. We consider this a positive move in conserving biodiversity, and the SA should reflect this. Similarly, the TAAP makes provision for walking/cycling facilities and Green Infrastructure. These have health and well-being benefits in themselves, in addition to providing alternative access to health care facilities, and we believe the SA could better reflect this.	Agreed.	Suggested amendments incorporated in submission SA.

These comments were made on the Initial Habitats Regulation Assessment.

Name	Consultee type	Comment	Response	Recommendation
Mike Meadows	Natural England	We agree with the conclusions of the Initial Habitats Regulations Assessment (HRA) with regard to direct impacts of built development, and with the conclusion on indirect impacts on the Breckland SAP. However, the Habitats Regulations Assessment of the Breckland Core Strategy did not rule out in-combination effects on the North Norfolk Coast SPA/The Wash & North Norfolk Coast SAC as a result of recreational disturbance, and concluded: <i>Mitigation measures need to be sought, in partnership with all other plan making authorities within a 20km arc of the international designations at the North Norfolk Coast, to prevent combined adverse effects.</i> Table 3 of the Initial HRA sets out the sites and issues considered in relation to the TAAP, but does not appear to consider the impacts of recreational; disturbance on sites other than the Breckland SPA. We therefore advise that the HRA of the TAAP considers this issue, and how the Council may work particularly with north Norfolk District Council and Borough Council of King's Lynn & West Norfolk. In paragraph 6.3.4, "Map 3" should be changed to "Map 5".	Agreed.	Comment to be passed on to consultants to consider as undertake the next iteration of the HRA.
Mike Meadows	Natural England	With specific reference to the Thetford Loops, as previously stated Natural England welcomes and supports the Thetford Loops initiative and we do not anticipate that there are nature conservation issues which cannot be overcome. We note that 21.26 of the TAAP recognises the potential conflict between public access and nature conservation in this area, and agree with the recommended changes to this paragraph.	Noted.	Recommendations in the HRA to be incorporated.
Mike Meadows	Natural England	We agree with the conclusions in relation to water abstraction and discharge, and infrastructure requirements. We agree with the conclusions on Barnham Cross Common SSSI.	Noted.	No further action other than addressing the recommendations in the HRA.
Mike Meadows	Natural England	With regards to the A11 road junction improvements required, we have highlighted the proximity of the works at the A11/A134 and A11/A1075 junctions to the Breckland SPA and SAC in our response to the EIA Scoping Opinion for the Thetford Sustainable Urban Extension (letter dated 10 February 2011, ref. LA3.1/15843), and agree that further assessment is necessary.	Noted.	An ongoing issue in liaison with partner organisations including the land owners. Policy TH on 27 on Junction improvements has been amended as a consequence of the Appropriate Assessment.
Mike Jones	RSPB	Recreational disturbance. Policy TH30 has the potential to increase disturbance levels within the Breckland Special Protection Area (SPA). The initial HRA concludes that it is not possible to rule out an adverse effect on the Breckland SPA from recreational disturbance promoted by the TAAP. In particular the HRA notes that green infrastructure measures such as the proposed Thetford Loops may not solve this issue and may exacerbate the problem. We support the recommendation in the HRA that additional policy wording is required in the TAAP and that	Noted.	Recommendations in the HRA to be incorporated.

Mike Jones	RSPB	Urban effects. The initial HRA notes four SSSI components of the SPA where adverse effects from increased housing and the Thetford Loops cannot be ruled out. As recommended in the initial HRA, the TAAP will need to establish the mitigation measures needed to ensure that no adverse effect will occur, as well as identify the means by which the measures will be funded and delivered.	Agreed. TAAP needs to be amended to recognise that Breckland Council is keen to work collaboratively with Natural England, RSPB, adjoining authorities and the Forestry Commission on a programme of works to better understand the scale of any effect arising from increased recreational pressure (monitoring) and consequentially any associated mitigation that would be required.	Bird Monitoring Framework produced. New policy on Biodiversity Management introduced and was subject to a 3 week technical consultation.
Mike Jones	RSPB	Water abstraction. The initial HRA considers the potential impacts of the TAAP on European sites through water abstraction. The initial HRA notes that there is uncertainty over how much development can occur before additional resources are needed to ensure no adverse effects on European sites. The TAAP should be able to indicate the level of development that would be possible before an adverse effect is expected. We recommend that the wording of policy TH34 is revised to ensure that no development beyond this level can occur until it can be demonstrated that adequate capacity exists to avoid an adverse effect on European sites. A similar policy approach was taken in the Greater Norwich Development Partnership (GNDP) Joint Core Strategy (JCS), under Policy 3, Energy and Water.		
Mike Jones	RSPB	This policy as presented in the submission draft of the GNDP JCS states that 'the release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development and to ensure that water quality is protected or improved, with no significant detriment to areas of environmental importance ... This water infrastructure will be upgraded as required and be operational in time to meet the demands of any development'. The results of the Inspectors' report into the GNDP JCS has recently been released and does not appear to make any changes to the above policy wording.	Noted.	Policy amended and approach similar to that suggested taken re water abstraction.

Mike Jones	RSPB	<p>Contamination from flood water and surface run-off. The initial HRA notes that no adverse effect on the integrity of European sites is expected provided that Thetford's sewerage capacity is upgraded prior to development. As per our comments above on water abstraction, we recommend that the wording of the relevant TAAP policies is worded strongly to ensure that no related development can occur until the necessary sewerage infrastructure is in place.</p>	<p>The TAAP provides a number of measures for controlling waste and surface water resulting from new development. These include requiring separate surface water and waste water drainage, the use of SUDS and a recognition that with water efficiency measures, the wastewater treatment works at Thetford can accommodate the proposed development within available discharge consents without adverse effect on the environment. Breckland Council is also keen to work with NCC on surface water management plan for the town.</p>	<p>No further action.</p>
Mike Jones	RSPB	<p>Recommendations from the Core Strategy HRA. The Core Strategy HRA recommends that Breckland Council should seek developer contributions to manage and produce an urban heaths management plan for the urban heaths in and near to Thetford (e.g. Thetford Heath, Thetford Golf Club and Marsh, and East Wretham and Brettenham) as well as a specific management plan for Barnham Cross Common. There should also be monitoring of disturbance on Breckland SPA species. Whilst the TAAP initial HRA makes reference to these recommendations, we would expect to see more details provided in the submission draft on how it will address these recommendations from the Core Strategy HRA. Information on developer contributions, an urban heath management plan and disturbance monitoring will also at least partially meet the recommendations made in the initial HRA for the final draft TAAP.</p>	<p>Noted.</p>	<p>Bird Monitoring Framework produced. New policy on Biodiversity Management introduced and was subject to a 3 week technical consultation.</p>