

## 1 Non-Technical Summary

### How to let us know your views on this SA

**1.1** The Submission Sustainability Appraisal Report is part of the portfolio of Submission documents for the TAAP. As such representations on the soundness of this Sustainability Appraisal need to be made using the appropriate form for representations. It is important that this form is used as it will enable Breckland Council and the Planning Inspector assessing the TAAP to accurately record your comment as being 'duly made' and understand whether the matter can be dealt with by way of written representation or whether it can only be reviewed through a public hearing as part of the examination.

**1.2** The representations form can be downloaded from [www.breckland.gov.uk](http://www.breckland.gov.uk) Alternatively, representations can be made directly on line using the form tagged to this document. To make your representation, simply click the relevant paragraph or table.

### Overview

**1.3** Breckland Council is required to carry out a Sustainability Appraisal (SA) of its Local Development Framework (LDF). This Non-Technical Summary summarises the Sustainability Appraisal Report which has been produced to accompany the Submission Thetford Area Action Plan. The role of the Sustainability Appraisal Report is to consider the positive and negative effects that the proposed draft policies and land allocations may have on the economic, social and environmental conditions of Breckland and mitigate any negative and maximise any positive effects of the Plan.

### Why undertake Sustainability Appraisal?

**1.4** The Planning and Compulsory Purchase Act (2004) requires Local Planning Authorities to undertake Sustainability Appraisal of Local Development Frameworks. Briefly, this means that Breckland Council must consider the social, economic and environmental effects of any plan being produced for the area.

**1.5** In addition to this mandatory requirement to undertake Sustainability Appraisals, Local Planning Authorities are required under European Directive, to undertake Strategic Environmental Assessment (SEA). The requirements for SA and SEA are distinct; however the Government expects that it is possible to satisfy the two requirements through a single approach.

### What is Sustainability?

**1.6** Sustainability is often defined as:

**1.7** *'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs'*<sup>(1)</sup>

**1.8** National planning policy requires that Local Authorities should consider the inter-relationships between social, economic and environmental considerations. Therefore, Local Authorities should seek to support sustainable development through their Local Development Frameworks.

### Methodology

**1.9** The Sustainability Appraisal Report for the Thetford Area Action Plan Development Plan Document (DPD) will be split into 4 documents; The Scoping Report, the Thetford Area Action Plan Preferred Options Sustainability Appraisal Report, the Thetford Area Action Plan Preferred Options Sustainability Appraisal Report and its update (this document) and the Submission Sustainability Appraisal Report (yet to be completed - due 2010/11).

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1 *World Commission on Environment and Development, 1987.*

**1.10** The Scoping Report set the context of the appraisal. It reviewed the plans policies and strategies relevant to Breckland and the Core Strategy and Development Control Policies document (Core strategy) and Thetford Area Action Plan (TAAP). It also established the baseline of the environmental, economic and social state of the District. From the baseline the Scoping Report highlighted a number of issues and problems which the Core Strategy and TAAP would need to tackle and take account of. A framework for testing the sustainability of policy options and the plan was developed. The review of literature and baseline has been updated to reflect some more recent literature and monitoring.

**1.11** The Submission TAAP includes some new policies that are not in the Draft Final document as well as some changed or updated policies from the Draft Final document.

**1.12** Where Policies have been changed from the Draft Final version, the new version of the policy is deemed as the submission policy and has been appraised. The previous preferred option has now become an alternative. Where there are new policies, alternatives have been assessed.

**What are the Key Sustainability issues in Thetford?**

**1.13** The key sustainability issues in Thetford have been identified through a review of relevant plans and programmes and through the collection and assessment of data relating to social, economic and environmental issues. The following table provides a summary of the key issues in Thetford.

SEA/SA Topic	Sustainability Problems specific to Thetford	Origin of Issue and Supporting Data	Possible options to address issue/problem in DPD
<b>Environment</b>			
Land, Water and Soil Resources	Loss of agricultural land	Although the agricultural land surrounding Thetford is grade 4 (on a scale of 1 (excellent) to 5 (very poor)), development on this land would still be a loss of resource. Some housing development in Thetford in the last 3 years has been completed on greenfield land and this trend is likely to continue due to lack of available brownfield land.	Ensure available brownfield land is promoted and allocated for development to minimise greenfield land releases. Promote efficient use of land. Provision of allotments.
	Tensions between water demand and supply.	Noted as a problem in East of England Plan and in the Thetford Water Cycle Study as well as the Breckland Water Cycle Study stage 2.	The Thetford Water Cycle Study will influence options addressing water in the Area Action Plan. Requirements to meet lower water consumption targets for new homes could reduce the demand for water. Retrofitting water efficiency devices to existing homes could help too. Exact route of any waste water treatments infrastructure to be determined. Waste water treatment works expanded and improved. BREEAM standards.
	Increased contamination of water and soil resources	Water Cycle Study refers to the geological map for the area. This shows that Thetford is underlain by a major chalk aquifer.	Ensure ground contamination is addressed as part of a masterplan/ development brief on previously developed sites. Due regard needs to be paid to protection of groundwater from pollution pathways that can be created by poorly managed or badly located infiltration SUDS and as such, there are restrictions on the types of infiltration SUDS systems permitted within developments. Based on the groundwater vulnerability and SPZ (Source Protection Zone) classification, there is likely to be some limitation on the amount of infiltration that would be permitted in the Thetford Urban Extension although with suitable pollution prevention such as hydrocarbon separators, infiltration SUDS or restricted infiltration SUDS should be acceptable

SEA/SA Topic	Sustainability Problems specific to Thetford	Origin of Issue and Supporting Data	Possible options to address issue/problem in DPD
			Seek to avoid allocating development on protected aquifers as best as practicable.
Climate Change , Air and Pollution	Development in certain areas may be subject to fluvial flooding and the effects of climate change	The River Thet which runs through the centre of Thetford has a flood risk attached to it. A number of homes and properties in the centre of the town are in Flood Zone 2 and Flood Zone 3.  Development such as the proposed Forum would also be vulnerable.  Identified in SFRA 1 and 2.	Ensure town centre development does not increase flood risk, or is at risk from flooding. Take note of SFRA 2 recommendations. Green Infrastructure provision. SUDS.
	Reduced Air Quality	Although generally good in Thetford, improvements could be made or the status quo maintained (as identified in the Baseline). The Air Quality Framework Directive, PPS1, PPG4, PPG13, PPS23, National Air Quality Strategy and Regional Spatial Strategy require air quality to be addressed.	Avoid development in locations that would adversely affect or be adversely affected by air quality. Allocate development in locations that will reduce vehicle use. As part of the Healthy Town status, promote walking and cycling as alternatives to private car use. Transport Study Stage 2 has recommendations. Plant more trees.
	Increased traffic congestion and increased dependency on forms of transport that contribute to climate change	Although baseline shows that car ownership and commuting by car is lower in Thetford than the rest of the District, walking and cycling levels are also low and the planned growth as set out in the Core Strategy could mean that reliance on single occupancy car use increases.	Allocate development to locations where car dependency and road freight is reduced. Enhance and promote public transport and infrastructure for walking and cycling. Aim for economic self containment by providing jobs as well as housing. Consider other innovative ideas to promote modal shift. The Thetford Loops. Regeneration town centre and provide improved improved local services to reduce longer journeys to other centres.
	Energy supply issues.	The Breckland A11 Energy Study has highlighted the potential issue of lack of available electricity supply for new developments.  There are technical fixes to address this issue.  Some Thetford households could be in Fuel Poverty, i.e. They spend 10% of the household income on fuel.	33KV substation required to the north of Thetford. Over the coming years, the Building Regulations will gradually require more energy efficient homes. Ways of addressing the energy efficient of the existing housing stock through retrofitting. Adoption of Carbon standards for Thetford. Setting up of an ESCO. BREEAM standards.
Biodiversity and Geodiversity	Effects on biodiversity and natural and semi-natural habitats as well as adverse effects on species as a result of development and the associated recreation pressure the increase in population will bring.	Identified in the literature review.  Thetford is surrounded by European designated environmental sites. The planned scale of development in Thetford may have the possibility to impact upon the integrity of these sites.  There are also 2 species of nationally important beetle in and around Thetford.  Pinelines and woodblocks are part of the cultural landscape and have associated wildlife benefits.  Other species of varying status of protection.	Ensure new development does not impact upon the integrity of European sites (in line with the Habitats Directive). Ensure new development does not involve the loss of semi-natural green spaces. Retain existing trees and hedgerows. Ensure development proposals are consistent with Appropriate Assessment findings. Design in Econet projects recommendations. Plant more trees and create habitats. Protect Gallows Hill and encourage appropriate management regime.

SEA/SA Topic	Sustainability Problems specific to Thetford	Origin of Issue and Supporting Data	Possible options to address issue/problem in DPD
Cultural Heritage and Landscape	Loss of historical assets and impact on historical character.	Thetford has a large number of historical assets including listed buildings and Scheduled Monuments. Development pressures could harm the character and setting of these assets. Pines and woodblocks are part of the cultural landscape	Ensure allocations close to historical assets and within the conservation area respect the character and setting of these assets. Identify any non designated heritage assets of local importance. Protect cultural landscape features as much as possible. Protect Gallows Hill and encourage appropriate management regime.
	Pressures on landscape from new development	The Breckland Settlement Fringe Landscape Assessment identifies areas to the West, South and East of Thetford as having moderate high to high landscape sensitivity to change. Development in these areas could negatively impact upon the character of these landscapes	Ensure new development allocations respect the character of landscape and takes into account the landscape's sensitivity to change. Identify any non designated heritage assets of local importance. Protect cultural landscape features as much as possible.
	The Need for Good Quality Design	A history of poor quality development has not been directly identified in the baseline, but there are issues relating to the conflict between the need to maximise land within built areas and protecting local important spaces, character and features. There is a strong perception that new development is undistinguished and lacks a sense of place. PPS1, PPS3, PPS7, PPG15, PPG16, the RSS and Breckland Council's Design Principles require that the quality and distinctiveness of the built environment be maintained.	Need new development to be carefully masterplanned taking into account of a characterisation analysis of existing environmental assets and settlement character. Inspire East involved in the production of the TAAP. Cultural landscape features will help give a sense of place.
<b>Social/Economic</b>			
Population and human health	Loss and continued shortfalls in the provision of public open space.	Although within Thetford there are large areas of amenity open space, there is a distinct lack of outdoor playing space (children's play and outdoor sports areas). Evidence from the Breckland Open Space Assessment identifies that the provision of outdoor sport areas and children's play areas in Thetford are below the NPFA standard.	Ensure new allocations do not result in a loss of open space. Ensure new allocations provide adequate levels of outdoor playing space. Attempt to address the current shortfall. Consideration of including requirement for Health Impact Assessment.
	Inequalities in health.	Evidence from Baseline identifies that life expectancy in Thetford is lower than the Breckland average and the national average. Thetford also has the highest number of emergency admissions in the district.	Address inequalities in health and attempt to improve life expectancy. Consideration of including requirement for Health Impact Assessment. Thetford has Healthy Town Status. Ensure provision of healthcare is planned to meet the needs of the existing and new population of the town.
	Higher crime rates in Thetford.	Evidence suggests that Thetford has more incidences of Crime than other settlements in Breckland	Encourage forms of design that reduce opportunities for crime (Secured by Design). Continued consultation with all emergency services.
	Ageing Population	Thetford has an ageing population and this trend is set to continue.	Ensure adequate health facilities are planned. Encourage forms of design that provide accessible and adaptable accommodation for everyone (Lifetime Homes).
	Pressure placed on healthcare infrastructure.	Thetford has an ageing population and this trend is set to continue.  More people could retire in the Thetford area.  Increasing pressure placed on the healthcare infrastructure of the area.	Ensure provision of healthcare is planned to meet the needs of the existing and new population of the town.

SEA/SA Topic	Sustainability Problems specific to Thetford	Origin of Issue and Supporting Data	Possible options to address issue/problem in DPD
	High incidence of Limiting Long Term Illnesses.	Although lower than the rest of the district, Thetford still has a slightly higher rate than the region.	Seek to reduce the causes of limiting long term illnesses. Thetford has Healthy Town Status. Consideration of including requirement for Health Impact Assessment.
Inclusive Communities / Economic Activity	Lack of affordable housing	Evidence in Baseline shows that very few affordable housing have been built in recent years. The Breckland SHMA identifies a significant lack of affordable housing across the District	Ensure adequate land is allocated to deliver levels of housing identified in Core Strategy.
	Deprivation and low paid economy	The wards of Thetford Abbey and Thetford Saxon have the highest % of people on job seekers allowance in the district. Areas of Thetford are some of the most deprived in the County. Education attainment is low.	Allocate strategic, accessible employment land. Provide adequate number of schools. Set requirement for land for Academy to change as required. Existing residential and employment estates regenerated. Retrofitting of energy efficiency devices.
	Vulnerable and constrained economy	Economic activity may be constrained by skills shortage, particularly in management and professional occupations. This may lead to problems in attracting such professionals to Thetford and may have a knock on effect in retaining employment.	Seek to promote high quality jobs. Allocate new areas of employment land. Seek to address skills shortage through adequate education provision. Set requirement for land for Academy to change as required.
	Higher order shopping centres outside the district attract shoppers from Thetford which results in a leakage of expenditure away from Thetford and Breckland.	No indicators currently identified to monitor retail performance of Thetford. Only retail unit vacancies can be monitored.  Retail Study (2010) identifies significant leakage of retail expenditure to other centres.  There may be a conflict between growth of retail facilities and protection of townscape and landscape.  More retail units in Thetford have become vacant over time.	Provide for retail and services that meet the need of Thetford and enhance levels of self-containment. Improvements to the Town Centre. Improvements to access to the Town Centre for all modes. Forum in the Town Centre would provide an anchor.

Table 1.1 Issues in Thetford

### Changes between the Preferred Options and Draft Final TAAP and Submission version

**1.14** The Submission version of the TAAP is slightly different to the Final Draft and Preferred Options versions. There are some new policies, some changed policies and some policies have not been carried over. The following table shows how the Submission versions and Draft Final TAAP and the Preferred Options version meet the Objectives of the TAAP.

Objective	Preferred Options	Draft Final and Submission
<b>Thetford SO1:</b> To provide the environment capable of delivering 5,000 net new homes in Thetford by 2026 of the right mix of housing to meet the needs of Thetford to ensure all residents have access to a decent affordable home. This new development will be integrated and meshed into the fabric of the town.	TH11, TH13, TH17, TH18	Thetford Urban Extension section, Transport sections.
<b>Thetford SO2:</b> To ensure high and stable levels of employment through restructuring the local economy providing the basis for a minimum of 5,000 net new jobs, especially high quality jobs, in Thetford in the period 2001-2021, so everyone can share in the prosperity of the District. To promote economic diversity and support economic growth.	TH4, TH11, TH17	New employment areas, Existing employment areas, Education section, Retail section, Transport sections.

Objective	Preferred Options	Draft Final and Submission
<b>Thetford SO3:</b> To address Thetford's current infrastructure deficits, plan for new infrastructure and ensure it is delivered with growth and not after. This includes green infrastructure.	TH3, TH8, TH13, TH17	Thetford Urban Extension section, Green infrastructure sections, Water sections, Energy and carbon sections, Social infrastructure sections.
<b>Thetford SO4:</b> To strengthen Thetford as a place for shopping, work, services and leisure. Balancing housing, employment and service growth to promote self-containment.	TH2, TH3, TH11, TH15, TH18	Retail section, Town Centre section, Indoor sports section.  Transport section.
<b>Thetford SO5:</b> To regenerate Thetford town centre as a focus for retail, services and leisure, including improving its evening economy offer.	TH2, TH3, TH9, TH15, TH17	Town centre section, Retail section.  Transport section.
<b>Thetford SO6:</b> To address the most severe pockets of deprivation in Thetford's residential and employment estates, through physical, social and economic regeneration projects.	TH16, TH17	Existing estate (employment and residential) section.
<b>Thetford SO7:</b> To create an environment in Thetford that facilitates healthy lifestyles for all.	TH1, TH5, TH13, TH14, TH17	Healthy lifestyles section, Health facilities section, Walking and cycling section, Allotments.
<b>Thetford SO8:</b> To conserve and enhance where appropriate the quality and distinctiveness of the biodiversity, geology and landscape setting of Thetford, and ensure growth respects such features.	TH6, TH7, TH12, TH13, TH15, TH17	Green infrastructure section, Gallows Hill section.
<b>Thetford SO9:</b> To protect and where appropriate enhance the heritage assets and townscape of Thetford and require new development to meet high quality design standards.	TH1, TH3, TH10, TH17	Green infrastructure section, Gallows Hill section, Town Centre section, Existing Buildings section, Design principles.
<b>Thetford SO10:</b> Development to be an exemplar for efficient use of resources (eg energy, water, building materials).	TH17	Energy section, Water section.  BREEAM section.
<b>Thetford SO11:</b> To reduce greenhouse gas emissions, mitigate and adapt to the effects of Climate Change.	TH8, TH9, TH10, TH15, TH17	Energy section, BREEAM section, Transport sections, Green Infrastructure, Flood risk and SuDS sections.
<b>Thetford SO12:</b> To turn around Thetford's current heavy reliance on the car to more sustainable forms of transport whilst ensuring good accessibility for all to jobs, facilities and services (including Green Infrastructure) in Thetford.	TH9, TH10, TH14, TH17	Transport sections, Design Principles.

**Table 1.2 Showing the changes between the Preferred Options and the Draft Final and the relation to the objectives.**

### How were the Strategy and Policies of the Plan Assessed for Sustainability

**1.15** The strategy and policies were tested against 17 sustainability objectives (and accompanying questions) that have been devised in order to test how the plan will address the sustainability issues in Thetford. The objectives and accompanying questions are on the following table:

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions
Land, water and Soil Resources	1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings.	Will it use land that has been previously developed?
		Will it use land efficiently?
		Will it protect and enhance the best and most versatile agricultural land?

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions	
	2. Limit water consumption to the capacity of natural processes and storage systems.	Will it reduce water consumption? (i.e. will usage be less than the averages given in the baseline of 146 litres per head?) Will it conserve groundwater resources?	
Climate change and air pollution	3. Reduce contributions to climate change.	Will it lead to an increased proportion of energy needs being met from renewable sources?	
		Will it reduce the emissions of greenhouse gases by reducing energy consumption?	
		Will it improve air quality?	
		Will it reduce traffic volumes?	
		Will it support travel by means other than the car?	
	4. Minimise waste production and support the recycling of waste.	Will it reduce household waste? Will it increase waste recovery and recycling?	
Biodiversity and Geodiversity	5. To avoid, reduce and manage flood risk.	Will it be at risk of flooding? Will it contribute to a higher risk elsewhere?	
		6. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	Will it protect, maintain and enhance sites designated for their nature conservation interest? Will it conserve and enhance species, diversity and avoid harm to protected species? Will it promote geodiversity? Will it conserve geodiversity?
Cultural heritage and landscape	7. Maintain, enhance and preserve the distinctiveness and diversity of landscape and townscape character.	Will it maintain and enhance the distinctiveness of landscape and townscape and character? Will it maintain and enhance the character of settlements? Will it protect and enhance open spaces of amenity and recreational value?	
		8. Conserve and where appropriate enhance the historic environment.	Will it protect or enhance sites, features of historical, archaeological, or cultural interest (Including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments)?
	Population and human health	9. Improve the health and well being of the population.	Will it increase life expectancy? Will it improve access to essential services such as health facilities? Will it encourage healthy lifestyles, including travel choices?
10. Reduce and prevent crime, and reduce the fear of crime.			Will it reduce actual levels of crime? Will it reduce fear of crime?
			11. Improve the quality and quantity of accessible open space.
Inclusive communities		12. Improve the quality, range and accessibility of essential services and facilities.	

SEA/SA Topic	Sustainability Appraisal Objective	Decision making (Appraisal) questions
	13. Redress inequalities related to age, gender, disability, race, faith, location and income.	Will it improve accessibility to shopping facilities?
		Will it reduce poverty and social exclusion in those areas most affected?
		Will it improve accessibility to essential services and facilities at home? Will it make accessibility worse?
	14. Ensure all groups have access to affordable, decent and appropriate housing.	Will it improve relations between people from different backgrounds and social group? Will it make relations worse?
		Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community?
		Will it reduce the number of unfit homes?
		Will it reduce housing need?
Economic Activity	15. Increase the vitality and viability of existing town centres.	Will it increase vitality of existing town centres?
		Will it increase viability of existing town centres?
	16. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	Will it support and improve education?
		Will it encourage employment and reduce unemployment overall?
		Will it improve access to employment / access to employment by means other than car?
	17. Improve the efficiency, competitiveness and adaptability of the local economy.	Will it improve business development and enhance competitiveness?
		Will it make land and property available for business development?
		Will it support sustainable tourism?

**Table 1.3 SA objectives and decision making questions.**

**1.16** The following tables provide an illustration of the effect of the policies of the plan on the 17 sustainability objectives:

Submission Policy	SA Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Land allocations	--	0	?	?	0	?/-	+	0	+	0	+	0	0	++	0	0	+
TH 1 Approach to the Town Centre	+	0	+	0	+	0	+	?	+	?	+/?	+/?	+/?	+/?	+	0	++
TH 2 New retail development	+	0	+	0	?/-	0	?	0	0	0	0	+	0	0	++	++	++
TH 3 Transport - Achieving Modal Shift	0	0	++	0	0	0	0	0	++	0	0	+	+	0	+	+	?
TH 4 The impact of change on pedestrians, cyclists and buses	0	0	++	0	0	0	0	0	++	0	0	+	+	0	+	+	0
TH 5 Thetford Bus Interchange	+	0	++	0	?	0	?/+	+	?/+	+	0	+	0	0	+	0	0
TH 6 Thetford Railway Station	0	0	++	0	0	0	++	0	0	+	0	0	0	?	0	0	0
TH 7 Healthy Lifestyles	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0
TH8 Monitoring and Management of Key Biodiversity Sites	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0
TH 9 Allotments	+	0	++	++	0	0	?	0	+	0	0	0	+	0	0	0	0
TH 10 Joe Blunt's Lane	0	0	+	0	0	+	+	+	+	0	0	+	0	0	0	0	0
TH 11 The Thetford Loops	0	0	+	0	?	0	?/+	?/+	++	0	?/+	?	?	0	+	0	0
TH 12 Indoor Sports Facilities	+	0	?	0	0	0	0	0	++	0	0	++	++	0	0	0	0
TH 13 Energy and Carbon - TAAP wide part a: FEES	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	0
TH 13 Energy and Carbon - TAAP wide part b: carbon offsetting	0	0	++	0	0	0	0	0	0	0	0	0	+	0	0	0	0
TH 14 ESCo/MUSCo	0	0	+	0	0	0	0	0	0	0	0	0	?/+	0	0	0	?/+
TH 15 Water and Drainage part a: Water resources TAAP wide	0	+	0	0	0	+	0	0	0	0	0	0	0	?/+	0	?/+	0
TH 15 Water and Drainage part b: water efficiency TAAP wide	0	++	0	0	?/+	+	0	0	0	0	0	0	?	+	0	0	0
TH 15 Water and Drainage part c: Site drainage TAAP wide	0	+	?	0	+	0	0	0	+	0	0	0	0	0	0	0	0
TH 16 Development in Flood Zones	0	0	?	0	++	0	0	0	+	0	0	0	0	0	?	0	0
TH 17 Archaeology part a: Area of Main Archaeological Interest	0	0	0	0	0	0	?	++	0	0	0	0	0	0	?	0	0
TH 17 Archaeology part b: Investigation Required in Other Locations of Archaeological Interest	0	0	0	0	0	0	?	++	0	0	0	0	0	0	?	0	0

Submission Policy	SA Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
TH 18 Sustainable Construction Standards for Non-Residential Development	0	+	++	+	0	?/+	0	0	+	0	0	0	0	0	0	0	?/+
TH 19 Theftord Urban Extension Strategic Design Principles.	0	+	+	0	+	+++	+	+	+	+	0	+	0	0	0	0	0
TH 20 Locally distinctive features of the landscape	+	0	0	0	0	+	+	0	0	0	+	0	0	0	0	0	0
TH 21 Gallows Hill Scheduled Monument (SM)	+	0	0	0	0	++	++	++	0	0	+	0	0	0	0	0	0
TH 22 Existing Buildings in the Theftord Urban extension	0	0	0	+	0	+	+	+	0	0	0	0	0	0	0	0	0
TH 23 Surface Water Management	0	?/+	0	0	++	+	+	0	+	0	+	0	0	0	0	0	0
TH 24 Walking and Cycling	0	0	++	0	0	0	0	0	++	0	0	+	+	0	?	+	?
TH 25 Buses part a services	0	0	++	0	0	0	0	0	0	0	0	+	+	0	+	+	?
TH 25 Buses part b routes	0	0	++	0	0	0	0	0	0	0	0	++	?/+	0	+	+	0
TH 25 Buses part c new bridge over the railway	0	0	++	0	0	0	?/+	0	+	0	0	++	?/+	0	+	+	0
TH 25 Buses part d design principles	0	0	++	0	0	0	0	0	0	0	0	++	?	0	+	+	0
TH 25 Buses part e funding	0	0	++	0	0	0	0	0	0	0	0	++	?	0	+	+	0
TH 26 A new railway station in the Urban Extension	-	0	++	0	0	0	0	0	0	0	0	?	?	?	?	?	?
TH 27 Changes to the A11 Trunk Road part a: delivery of upgraded junctions	?/-	0	?/-	0	?/-	?/-	?/-	0	0	0	0	0	0	?/+	0	0	?/+
TH 27 Changes to the A11 Trunk Road part b: junction standards	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0
TH 27 Changes to the A11 Trunk Road part c: A11 lighting	0	0	+	0	0	+	+	0	0	0	0	0	0	0	0	0	0
TH 28 Improvements to the local road network	0	0	?	0	?/-	?/-	?	?	0	0	0	0	0	?/+	0	0	?/+
TH 29 New Employment Land part a: amount of employment land a location	--	?	?	?	?	?/-	+	?	0	0	0	0	0	0	0	++	++
TH 29 New Employment Land part b: layout and design principles	0	0	+	+	0	?	+	0	+	?	0	0	+	0	0	+	0
TH 30 New Local Centre in the Urban Extension	-	0	+	0	0	0	0	0	?	0	0	+	+	0	?/-	+	0
TH 31 Connecting to a Decentralised Energy Supply	?	?	?+++	?	0	0	0	0	0	0	0	0	0	0	0	0	0

Submission Policy	SA Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
TH32 Education Provision in the Thetford Urban Extension	-	0	+	0	0	?	?	0	+	0	?	++	+	0	0	++	+
TH 33 Health Provision	-	0	+	0	0	?	?	0	++	0	0	++	?	0	0	0	0
TH34 Community Buildings Policy part a: shared facilities	+	+	?	0	0	0	0	0	+	0	0	+	+	0	0	0	0
TH 34 Community Buildings Policy part b: New community centres	-	+	+	0	0	0	0	0	+	0	0	+	+	0	0	0	0
TH 34 Community Buildings Policy part c: religious buildings	-	0	+	0	0	0	0	0	0	0	0	+	+	0	0	0	0
TH 35 New Bring Recycling Centres	0	0	+	++	0	0	0	0	0	0	0	0	0	0	0	0	0
TH 36 Redevelopment proposals in Existing Residential Areas	+	+	+	0	+	0	+	0	+	+	+	0	?	+	0	0	0
TH 37 Existing Employment Areas	+	?	?	?	?	0	?	0	?	0	0	0	0	0	0	+	++
TH38 Settlement Boundary - excluding the Urban extension	+	0	0	0	+	+	+	+	0	0	+	0	0	0	0	0	0
TH38 Settlement Boundary - Urban Extension	+	0	0	N/A	0	0	0	+	0	N/A	0	0	N/A	++	0	0	+
<b>Cumulative Effect</b>	?	+	++	+	+	+	+	+	++	+	+	+	+	+	+	+	+

**Table 1.4 The Cumulative Effect of the TAAP Policies on the SA Objectives.**

### What alternative policies and land allocations were considered?

**1.17** The following tables summarise the alternative options and why they were rejected. A traffic light system has been used to highlight the SA assessment - Green is deemed as most sustainable and red least.

- Land Allocations

Land Allocations			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Major development to the north of Theford.	Scored positive on climate change, biodiversity, landscape and ensuring all groups have access to affordable and decent housing.	Preferred	A constraints analysis was completed as detailed in the Housing Topic Paper. Growth to the north of the Town within the A11 is least constrained and more deliverable.
Development to the South East	Scored negative on biodiversity, and potentially positive on ensuring all groups have access to affordable and decent housing. but otherwise scored similarly to the preferred option.	Rejected	See above. The South East is entirely within the Stone Curlew Buffer.
Development to the north of the A11.	Scored negative on biodiversity and landscape, but positive in ensuring all groups have access to affordable and decent housing.	Rejected	See constraints analysis comment above. Development to the north of the town would result in 2 towns with associated integration and transport issues. Direct conflict with Core Strategy policy which states the urban extension will be within the A11.

- TAAP wide policies

TH1: Approach to the Town Centre.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Seeks to enhance the town centre and comes up with guidance for any change and highlights need for town centre masterplan. Same as Draft Final Policy, but with some text changes to aid clarification.	Positive on many criteria such as climate change and effect on society.	Preferred	Provides some guidance to change in the town centre and prompts a town centre masterplan which will benefit many SA objectives.
No policy	Uncertain as changes to the town centre could be put in place, but in an adhoc manner.	Rejected	Lack of certainty and clarity on this issue is unhelpful.

TH2: New retail development.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Directs convenience development (330m2 net) to town centre to 2016. Long term needs of the town would need to address the sequential approach. Out of centre retail proposals with the potential to jeopardise viability of town centre not permitted.	Positive on many SA objectives such as the town centre, business and Greenfield land, but negative on flood risk.	Preferred	Directs retail in a way that will benefit many SA objectives.

Less convenience development.	Negative on many SA objectives including climate change and improving the town centre.	Rejected	Lower figures is contrary to evidence and will not help the town to revitalise.
Lower standards/less specific policy.	Negative on use of Greenfield land and flood risk, but positive on the town centre and business.	Rejected	Higher figures are contrary to evidence and could result in more out of centre retail.

TH3: Transport – achieving modal shift			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
All development in Thetford will be required to contribute proportionally to a raft of measures necessary to achieve the modal shift from single occupancy car journeys to other forms of movement.	Positive on many SA objectives such health and climate change.	Preferred	Modal shift is key to enable change to happen in the town.
No policy	Negative on may SA objectives including climate change and health.	Rejected	
Fewer measures and less emphasis on modal shift.	Negative on may SA objectives including climate change and health.	Rejected	

TH4: Impact of change on pedestrians, cyclists and buses			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Any type of development which adversely affects the identified movement routes of pedestrians, cyclists and public transport will not be permitted. As per Draft Final Policy, with some text changes to aid clarification.	Positive on many criteria such as climate change, health and access.	Preferred	Provides some guidance to change in the town. Modal shift is key to enable change to happen in the town.
No policy	Uncertain as pedestrians, cyclists and buses could be provided for as Thetford changes.	Rejected	Policy would give more certainty regarding consideration to vulnerable and sustainable road users.

TH5: New bus interchange.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Provision of a new bus interchange in the Minstergate Area, using the Cosy Carpet building.	Positive on many SA objectives such as the town centre, business, climate change, historic environment and Greenfield land.	Preferred	Favoured location in evidence base. Bus station would be closer to train station. Listed building would be improved this aiding regeneration.
Leave bus station as it is but improve it.	Positive on many SA objectives such as town centre and climate change. Negative on flood risk. Uncertain on landscape and townscape.	Rejected	Evidence base preferred option. Does not make the most of the river side location. Potential for other useful uses. Uses route which is a key pedestrian desire line to Grammar School as well as the Town Centre and areas to the north and south of the town.
Move bus station to other location.	No other suitable location identified so uncertain.	Rejected	No other suitable location identified.

TH6: Thetford Railway Station			
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Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Improving the train station by improving cycle and car parking provision, active use of the buildings, investigate improving access between platforms and improve bus links to the station, allowing Offices and some A uses that compliment not compete with the town centre. As per draft final policy, but giving separate guidance for the old warehouse building to the west of the main station buildings.	Positive on many criteria such as climate change, townscape and historic environment.	Preferred	Policy approach will improve station for users and improve listed buildings.
No policy	Uncertain but could be negative on some criteria such as climate change and historic environment.	Rejected	Changes to the station could happen, but might not benefit SA objectives.

TH7: Healthy lifestyles.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Requires Health Impact Assessment or checklists to be completed to accompany planning applications.	Positive on health.	Preferred	Policy approach will embed health as Thetford changes. It will also look to continue the legacy of Thetford Healthy Town.
No policy	Uncertain as change may still benefit health.	Rejected	No policy will result in lack of certainty on the issue of Health and a changing Thetford.

TH8: Monitoring and Management of Key Biodiversity Sites.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Seeks to continue suitable management of key biodiversity sites as well as managing the potential urban effects of the proposed changes to the town on these sites	Strong positive with regards to biodiversity.	Preferred	Protects biodiversity in the area.
No policy	Strong negative with regards to biodiversity.	Rejected	Does not protect biodiversity in the area.

TH9: Allotments			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
20 full or 40 half sized plots per 500 dwellings to meet some set criteria.	Positive on Greenfield land, and health. Double positive on Climate Change and waste.	Preferred	This amount has been through 2 rounds of consultation and has, in general, had support. This amount and the criteria should ensure sufficient provision of allotments for the Urban Extension residents.
Fewer allotments.	Similar to the preferred approach, but single positive.	Rejected	Thetford's existing population is short of allotments. The preferred approach should see that the future community are adequately provided for.
More allotments	As per preferred approach.	Rejected	As per preferred approach, but as there is limited land available for development in the area, less housing could be provided.

No policy	Uncertain as allotments could still be provided.	Rejected	Allotments could still be provided, but a policy would give standards and provide certainty.
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TH10: Joe Blunt's Lane			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Protects the integrity of Joe Blunt's Lane. As per draft final policy but some changes to allow limited and controlled bus use of the railway underpass.	Positive on many SA objectives including access, health and landscape.	Preferred	Policy approach ensures this route is protected and enhanced,
No policy	Uncertain as could not be harmed by development.	Rejected	No policy will result in lack of certainty on whether this route will be protected.

TH11: Thetford Loops			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
The provision of high quality and multi purpose loops for utility journeys, tourism and recreation. As per Draft Final Policy, but text amended to aid clarification around delivery and to reflect initial HRA comments on potential impacts on protected species.	Positive on Climate Change, Health and access. Could be positive on more.	Preferred	Policy approach will benefit utility and recreational journeys by foot and by bike and help people access areas of Thetford and its surrounds by these modes.
No policy	Some negatives on such SA objectives as climate change and access.	Rejected	No policy could mean that residents are still not able to access parts of the area easily by modes other than walking and cycling.

TH12: Indoor sports facilities			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Seeks to direct extra sports facilities to the town centre or areas well related to the town centre. As per the Draft Final Policy, but gives guidance on school usage and also includes extra provision in policy.	Positive on many SA objectives including access and health	Preferred	Policy approach ensures indoor sports is provided and in a location that is easily accessible and by modes other than single occupancy car use.
No policy	Uncertain indoor sport could still be provided.	Rejected	No policy will result in lack of certainty.

TH13 – Energy and Carbon – TAAP Wide			
Part a: Energy efficiency and low and zero carbon homes.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
All new residential development is required to utilise fabric measures to meet the Government's levels of carbon compliance. This is a change in	Could be positive on climate change and redressing inequalities.	Preferred	There is no specific Thetford evidence to require development to be built to energy efficiency standards in advance of the tightening of the national regulations. Additionally there is no specific evidence to demonstrate that a policy requirement for more rigorous construction

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emphasis of this section of the policy, when compared to the Draft  Final Policy, by removing the need for applicants to set out their approach to meeting the  Government's timetable for tightening the building regulation.			standards would be viable in the Thetford context. The policy is one of encouragement and providing a positive context for innovation and investment, however, increased benefits for climate change are dependent on the applicant.
No Policy. Rely on Building Regs as above, but no need to highlight approach in application and no emphasis on FEES.	Uncertain on climate change.	Rejected	Without a policy, there is less encouragement and positive context for applications to be submitted for proposals in excess of current building regulations which is likely to deter investment or worse allow for innovation to be stifled or constrained.
Part b: Carbon offsetting			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Council will consider the setting up of a carbon offset fund.	Positive on climate change and redressing inequalities.	Preferred	It is likely that the national definition of zero carbon will have to include some element of off-setting as it is technically unfeasible to construct a zero carbon dwelling. The positive policy will enable a fund to be established in the short term ready for the national definition being introduced.
No policy	Uncertain on climate change and redressing inequalities.	Rejected	Without a policy, there is less encouragement and positive context for applications to be submitted for proposals in excess of current building regulations which is likely to deter investment or worse allow for innovation to be stifled or constrained. Therefore the implications for climate change are uncertain.

TH14: Energy Service Company (ESCO)			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
The Council will promote and encourage ESCOs/ MUSCOs who wish to develop and supply energy within the TAAP area. In particular, the Council will support ESCO developments where these would secure the delivery of zero carbon homes by 2016 by supplying decentralised renewable energy.	Potentially positive on climate change, economy and redressing inequalities.	Preferred	The policy approach will encourage ESCO with potential benefits to climate change, business and the population.
No Policy - rely on speculative private development.	Uncertain on climate change, economy and redressing inequalities.	Rejected	No policy will result in lack of certainty.

TH15: Water and drainage			
Part a: water resources – TAAP wide.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason

Seeks to control release of land for development to ensure no adverse effect on European designated sites. Requires applicants to prove enough capacity for water and waste water.	Positive on flood risk and biodiversity. Potentially positive on housing and employment land delivery.	Preferred	Provides certainty regarding deliverability of proposals.
Requires applicants to prove enough capacity for water and waste water.	Positive on flood risk. Potentially positive on housing and employment land delivery.	Rejected	Provides certainty regarding deliverability of proposals.
No Policy.	Uncertain but could be negative.	Rejected	No policy would mean that there could be uncertainty regarding deliverability of proposals.

Part b: water efficiency

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Requires new homes to have maximum of 105 litres per person per day.	Positive on climate change, biodiversity and housing delivery.	Preferred	Preferred due to benefits on SA objectives.
No policy	Could be negative on climate change, biodiversity and housing delivery.	Rejected	Although building regulations could change in the future, this policy provides some certainty and goes further than building regulations.

Part c: site drainage

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
All new development must be served by separate surface water and wastewater drainage.	Positive on water, flood risk and health.	Preferred	Ensures drainage is addressed.
No policy	Potentially negative on water, flood risk and health.	Rejected	Lack of policy would result in lack of certainty.

TH16: Development in flood zones.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Addresses the flood zones in the town centre. Gives criteria to assess development proposals.	Positive on flood risk and health. Uncertain on climate change and change in the town centre.	Preferred	Ensures the issue of flood zones is addressed.
No Policy	Uncertain on flood risk and health, climate change and change in the town centre.	Rejected	No policy will result in lack of certainty.

TH17: Archaeology

Part a: Area of main archaeological interest.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Map shows area of main interest. Sets requirements on applicant regarding appropriate archaeological assessments and what to do if find some archaeology of interest.	Positive on historical environment.	Preferred	Seeks to protect the historic environment of Thetford.
No Policy	Uncertain on historical environment	Rejected	No policy will result in lack of certainty.

Part b Information required in other locations of Archaeological Interest.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
In areas other than those covered by part a, where there is no overriding case for any remains to be preserved in situ, Planning Permission for development which would destroy or disturb potential remains will be granted subject to an appropriate programme of archaeological investigation and recording being undertaken prior to the commencement of such development.	Positive on historical environment.	Preferred	Seeks to protect the historic environment of Thetford.
No Policy	Uncertain on historical environment	Rejected	No policy will result in lack of certainty.

TH18: Sustainable construction standards for non-residential development.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Requiring BREEAM standard.	Positive on many criteria such as climate change, biodiversity and access.	Preferred	Policy would ensure new non residential development is as sustainable as possible.
Not stipulating BREEAM standards i.e. No policy. Rely on Building Regulations.	Potentially negative and uncertain on many criteria such as climate change, biodiversity and access.	Rejected	No policy could result in such buildings not being as sustainable as they could be
Stipulating higher BREEAM levels.	Positive on many criteria such as climate change, biodiversity and access. Potentially negative on deliverability.		Policy would ensure new non residential development is as sustainable as possible but such requirements could make development not economically viable.

• Thetford Urban Extension Policies

TH19: Thetford Urban Extension strategic design principles.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Some additions to the Draft  Final Policy. Gives principles that apply to all development in the Thetford Urban Extension.	Scored positive on water consumption, climate change, biodiversity and landscape amongst others.	Preferred	Sets principles that will guide the growth and benefit many SA Objectives. Having a policy gives clarity and certainty.
Gives principles that apply to all development in the Thetford Urban Extension.	Scored positive on water consumption, climate change, biodiversity and landscape amongst others.	Rejected	Sets principles that will guide the growth and benefit many SA Objectives. Having a policy gives clarity and certainty.
No policy on design principles	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.

TH20: Locally distinctive features of the landscape			
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Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Seeks to protect the existing hedges, pinebelts and tree blocks on the greenfield site and manage to benefit biodiversity.	Scored positive on reducing loss of Greenfield land as well as protecting biodiversity and landscape.	Preferred	Ensures such features are protected giving a sense of place as well as benefitting biodiversity.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.

TH21: Gallows Hill Scheduled Monument

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Gives some guidance to how the monument could be used. As per Draft Final policy, but with some added text to aid clarification.	Scored positive on reducing loss of Greenfield land as well as protecting biodiversity and landscape and the historical environment.	Preferred	Ensures the monument is used in a way to benefit many SA objectives.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit. Increased risk of adverse impact on Gallows Hill.

TH22: Existing buildings in the Thetford Urban Extension.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Existing buildings within the Thetford Urban Extension should be retained as undesignated heritage assets of local historic interest.	Scored positive on landscape, biodiversity and historical environment.	Preferred	Ensures that these existing buildings are protected and enhanced.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit. Increased risk that buildings will be lost.

TH23: Surface Water Management.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Surface Water Management Plan required with Planning Application meeting a number of criteria including approach to SUDS and how biodiversity will benefit. As per draft final policy but with 2 additional	Scored flood risk, biodiversity, landscape and open space.	Preferred	Ensures runoff rates pre development are maintained and that features benefit many SA objectives.

criteria relating to greenfield runoff rates and regard given to local drainage context beyond site boundary.			
No policy.	<p>Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.</p>	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit. Increased risk that surface water will not be adequately considered or managed.

TH24: Walking and Cycling			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
A walking and cycling network will be identified and the design detailed as part of any planning application for the Urban Extension and agreed with both the Local Planning Authority and the Local Highways Authority. Development proposals must contribute to the network. As per draft final policy but some slight text additions regarding safety and convenience to aid clarification and strengthen policy.	Scored very positive on climate change and health objectives.	Preferred	Walking and cycling is key to attaining modal shift and making the changes in Thetford work.
No policy.	<p>Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.</p>	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit, particularly in relation to the need to secure modal shift.

TH25: Buses			
(a) Services			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Requires the provision of new bus services to the town and preferably employment areas. Sets minimum frequency of every 10 minutes. Highlights need for a bridge over the railway.	Positive on Climate Change as well as improving the accessibility of services and employment areas.	Preferred	Buses are key to attaining modal shift and making the changes in Thetford work.
No policy.	<p>Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.</p>	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit particularly in relation to the need to secure modal shift.

(b) routes			
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Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Requires attractive and practical routes which maximise bus penetration into the Urban Extension. Routes must include facilities and services as destinations.	Benefits Climate Change as well as accessibility to services and employment areas.	Preferred	Attractive routes will help make the buses an attractive alternative to single occupancy car use.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit particularly in relation to the need to secure modal shift.

(c) A new bridge over the railway

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Requires a new bus/pedestrian/cycle bridge over the railway between Joe Blunt's Lane and the A11.	Benefits climate change as well as accessibility to services and work.	Preferred.	Provides for buses, cycles and pedestrians. Provides a direct route.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit particularly in relation to the need to secure modal shift.

(d) Bus design principles

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Sets detailed design principles for bus stops and at junctions.	Benefits Climate Change as well as accessibility to services and employment areas.	Preferred	Designing facilities for buses will help make the buses an attractive alternative to single occupancy car use.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit particularly in relation to the need to secure modal shift.

(e) Funding

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
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Requires bus provision to be developer funded.	Benefits Climate Change as well as accessibility to services and employment areas.	Preferred	Funding to help make the buses an attractive alternative to single occupancy car use.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit particularly in relation to the need to secure modal shift.

TH26: A new railway station in the Urban Extension

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Land set aside for the potential of a new railway station between Joe Blunt's Lane and the A11.	Scores negative on Greenfield land usage but strong positive on climate change. There are a number of uncertain impacts of this policy.	Preferred	A new station could be a solution to transport issues in the medium to the long term. Setting aside land for such a use for consideration at a later stage in the process is a way of ensuring a railway station is feasible.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit particularly in relation to the need to secure modal shift.

TH27: Changes to the A11 Trunk Road

Part a: Delivery of upgraded junctions.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
The 5 junctions on the A11 bypass around Thetford will be upgraded. Safeguards the ability for junctions to be improved. As per the Draft Final Policy, but with greater emphasis on potential impacts on protected habitats and species.	Scores potentially negative on many criteria such as land take, biodiversity, landscape and climate change. Scores positive on efficiency of local economy.	Preferred	Growth in Thetford and across the East of England will result in unavoidable additional traffic on the A11 despite policies to secure modal shift. The future efficiency of the A11 will require a combination of strategic and local improvements. Whilst improving the five junctions at Thetford will result in loss of greenfield land in sensitive locations, the alternative is congestion (with consequential effects on air quality/climate change) and negative impacts for the local economy.
No policy.	Not having a policy does not necessarily mean that such changes will not happen.	Rejected	If no policy, there would be greater uncertainty. The scheme would need to be negotiated between developer and the Highways Agency and Norfolk County Council. Not having a policy

			could see the negatives as shown above become more negative as the schemes could be over engineered.
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Part b: Junction standards

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Sets standards for junction upgrades	Benefits flood risk, biodiversity and landscape.	Preferred	Sets standards for the junctions to benefit SA objectives.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.

Part c: Lighting on the A11

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Junction lighting must reduce glare and maintain night time character.	Benefits climate change, biodiversity and landscape.	Preferred	Policy requires improvements to the efficiency of lighting thus benefitting SA objectives.
No policy.	Negative effect on biodiversity and landscape.	Rejected	Not having a policy could be a negative impact on biodiversity and landscape objectives as without a policy, it cannot be guaranteed that changes will not harm landscape or biodiversity.

TH28: Improvements to the local road network

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Identifies five key areas of the local road network for upgrading.	Scores negative on landscape and biodiversity, but positive on improving the local economy.	Preferred	The junction improvements will help vehicular movements around the town and will cater for pedestrians, cyclists and buses.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.

TH29: New Employment

Part a: Amount of employment land and location.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
22Ha serviced employment land.	Scores negative on use of Greenfield land, but positive on employment and economy criteria. There are also some uncertainties.	Preferred	This policy meets the needs of the Core Strategy which results in benefits to some SA objections, but conflicts with others.

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Less employment land.	Scores negative on use of Greenfield land, but positive on employment and economy criteria. There are also some uncertainties.	Rejected	Evidence base recommends 30-40Ha of employment land.
More employment land.		Rejected	

### Part b: Layout and design principles.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Sets some guidelines for the design of the new employment areas.	Benefits climate change and waste as well as landscape and biodiversity. Also benefits access to work.	Preferred	Sets standards for the employment areas to benefit SA objectives.
No policy.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.

### TH30: New local centre in the Urban Extension.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
In essence the same as the Draft Final TAAP, but lower floor space figures: 1,700 m2 (net) in total of which 500m2 is comparison and 1,200m2 is convenience.	Scores negative on Greenfield land, but positive on access to facilities.	Preferred	Policy makes it clear that such a centre should compliment not compete with the town centre. The objective is to secure sustainable local trips to access day-to-day items without the need to use the private car.
The Local Centre delivered as part of the Urban extension will provide approximately 2,300m2 (net) floorspace. Of this, approximately 1,100m2 (net) should be provided as new comparison goods floorspace, and 1,200m2 (net) new convenience floorspace. The preference is that this convenience element is provided as a single small foodstore.	Scores negative on Greenfield land, but positive on access to facilities. Could be a negative effect on the town centre.	Rejected	Policy makes it clear that such a centre should compliment not compete with the town centre. The objective is to secure sustainable local trips to access day-to-day items without the need to use the private car.
No Policy - rely on Core Strategy and PPS4.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.
A different strategy, relying on out of town retailing.	Whilst similar to no policy in some aspects, it is felt that this approach would have a negative effect on the town centre.	Rejected	Not taken forward due to potential for harm to the town centre.

### TH31: Connecting to a Decentralised Energy Supply.

Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
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<p>New development in the Urban Extension should be designed in a manner that allows for the connection, or potential future connection, to a decentralised energy supply as part of meeting relevant carbon compliance levels in the Building Regulations. As per draft final policy, with some text additions to aid clarification.</p>	<p>Uncertain effect on Climate Change, but could be positive.</p>	<p>Preferred</p>	<p>Eventually, new homes will have to meet zero carbon. It could be more economical to do that so by having the ability to connect to a decentralised energy supply.</p>
<p>No Policy - no requirement re design to allow for potential connection to a decentralised energy supply. Rely on FEES or other micro renewables.</p>	<p>Uncertain effect on Climate Change, but could be positive. Could be negative in relation to delivery of housing.</p>	<p>Rejected</p>	<p>Eventually, new homes will have to meet zero carbon. It could be uneconomical to that on a building by building basis.</p>

TH32: Education provision in Thetford			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
<p>Three primary schools. all secondary education offer combined at the Academy North Site. Access by sustainable modes of transport.</p>	<p>Negative on use of Greenfield land, but positive on the effect on society.</p>	<p>Preferred</p>	<p>Gives greater certainty and clarity that such supporting social infrastructure will be provided in the correct manner.</p>
<p>Three primary schools, North Academy possibly expanded and land reserved for new 16-19 year old education provision (sixth form and further/higher education).</p>	<p>Negative on use of Greenfield land, but positive on the effect on society.</p>	<p>Rejected</p>	<p>Gives greater certainty and clarity that such supporting social infrastructure will be provided in the correct manner.</p>
<p>No education policy - rely on site-by-site negotiations.</p>	<p>Negative on use of Greenfield land. Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.</p>	<p>Rejected</p>	<p>Lack of certainty and clarity on this issue is unhelpful.</p>
<p>Lower standards/less specific policy.</p>	<p>Negative on use of Greenfield land. Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.</p>	<p>Rejected</p>	<p>Lack of certainty and clarity on this issue is unhelpful.</p>

TH33: Health facilities			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
<p>Provision of other new health facilities in the Urban Extension from 2016. General text is as per Draft Final Policy, although</p>	<p>Negative on use of Greenfield land, but positive on the effect on society.</p>	<p>Preferred</p>	<p>Gives greater certainty and clarity that such supporting social infrastructure will be provided in the correct manner.</p>

revised evidence base has resulted in changes to numbers of GPs and dentists.			
Earlier provision.	Negative on use of Greenfield land. Whilst a lack of policy does not necessarily mean such principles/issues  will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Policy approach follows NHS Norfolk advice.
No policy or later provision.	Whilst a lack of policy does not necessarily mean such principles/issues  will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Lack of certainty and clarity on this issue is unhelpful.

TH34 Community Facilities			
Part a: Shared facilities			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Using new or rebuilt school facilities for community uses. Note that usage depends on the Governing Body.	Scores positive on Greenfield land, health and the society.	Preferred	Favoured as multifunctional use of buildings will help with the running of the building and its prolonged use.
No policy	Uncertain on some criteria.	Rejected	Facilities maybe shared without a policy, but the policy sets the Council's preference.
Part b: New community centres.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Certain criteria which proposals for new community centres should demonstrate in order to ensure sustainability.	Negative on use of Greenfield land, but positive on the effect on society.	Preferred	Sets standards for the community centres to benefit the SA objectives.
No policy	Whilst a lack of policy does not necessarily mean such principles/issues  will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.
Part c: Religious buildings			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Sets some guidelines for the design of the new employment areas.	Positive on the effect on society.	Preferred	Sets standards for the religious buildings to benefit the SA objectives.

Certain criteria which proposals for new community centres should demonstrate in order to ensure sustainability.	Whilst a lack of policy does not necessarily mean such principles/issues will be not addressed, it will ultimately depend and rely on the developer and on the general principles in the Core Strategy.	Rejected	Not having a policy does not give the certainty or clarity that SA Objectives will benefit.
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TH35 Bring recycling centres			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Provision of bring recycling centres at Local Centres. As per draft final policy, but with some additions to emphasise the importance of managing these sites.	Positive on waste and climate change.	Preferred	Gives greater certainty and clarity that such supporting social infrastructure will be provided in the correct manner.
No policy	Uncertain as such provision could be put in place.	Rejected	Lack of certainty and clarity on this issue is unhelpful. Also, not having a policy means no guidance is given.

TH36: Redevelopment proposals in existing residential estates.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Supports proposals for redevelopment of the existing estates which meet certain criteria. As per the draft final policy, but with 3 additional criteria on flooding, shopping parades and co-ordination with other changes in the area.	Positive on many SA objectives such as Greenfield land, climate change, landscape and benefits to the society.	Preferred	Improving parts of the existing town is as important as planning for the new growth. This policy seeks to guide such changes.
No policy.	Uncertain on many SA objectives such as Greenfield land, climate change, landscape and benefits to the society.	Rejected	Changes to the existing estates could still happen, but this policy guides such changes.

TH37: Existing employment areas.			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason
Intensification of existing employment areas. Potential use of concept statements/spatial framework.	Positive on many SA objectives such as Greenfield land, climate change, landscape and benefits to the employment.	Preferred	Improving parts of the existing employment estates is as important as planning for the new growth. This policy seeks to guide such changes.
No policy.	Potentially negative on climate change and landscape. Uncertain on health and employment.	Rejected	Changes to the existing estates could still happen, but this policy guides such changes. Changes could be on an ad hoc basis which could not be of benefit on a spatial scale.

Settlement Boundary			
Option	Sustainability Appraisal Summary	Preferred or rejected?	Reason

Amend Draft Final Settlement Boundary to include Broom Covert and use the A11 as the boundary to the north of the town.	Scored positive on flood risk, protecting biodiversity and landscape.	Preferred	Reflects the policies in the Core Strategy by enabling growth and protecting biodiversity and important landscape from development.
Draft Final Settlement Boundary	Scored positive on flood risk, protecting biodiversity and landscape.	Rejected	Reflects the policies in the Core Strategy by enabling growth and protecting biodiversity and important landscape from development.
Retain as per 1999 Local Plan.	Scored negative on flood risk and protecting biodiversity.	Rejected	Leaving the settlement boundary as it is would not meet the Core Strategy requirements and result in pressure for development on potentially unsuitable areas

**What are the Effects of the Plan on the Sustainability Baseline?**

**1.18** In general the SubmissionTAAP performs well against the 17 sustainability objectives. This is partly because of the relatively harmonious relationship between the Spatial Objectives of the plan and the identified sustainability objectives. The most significant negative impact of the plan on the sustainability appraisal baseline is the loss of undeveloped land due to the pressures of growth and the lack of previously developed land in the town. This effect will be mitigated through the promotion of identified previously developed land and ensuring development does not take place on the higher grades of agricultural land.

**Monitoring Proposals**

**1.19** The identified effects of the plan will be monitored on an annual basis against a set of of indicators detailed in Chapter 9 of the main SA: Proposals for Monitoring.