

# Report to Summarise the Comments made to the Draft Final Thetford Area Action Plan and Breckland Council's Response and Way Forward.

## 1. Introduction

The public consultation on the Draft Final Thetford Area Action Plan (TAAP) was undertaken between 31 January and 4 March 2011. It follows Issues and Options consultation in Summer 2008 and a Preferred Options consultation in Spring 2009.

As part of the Draft Final TAAP consultation:

- Leaflets were sent out to the vast majority of households in the area with the About Thetford Magazine;
- An open day was held in the town; and
- The One Stop Bus went to 4 different places in the area.

Breckland Council received over 800 comments to the Draft Final TAAP. Breckland Council would like to thank all those who took time to submit their comments. All comments have been read and considered in the round in preparing the final document.

This document summarises the comments received as part of this consultation, as well as BDC's response and the way forward in improving the TAAP as it progresses towards the Submission stage.

All the comments in full detail, including who made the representation, can be found in an accompanying document which sets out the full representations. Please note that this document extends to 250 pages and is not being printed but is available to view on-line as part of the agenda paperwork.

## 2. General Comments

General comments were received on the principle issues around the growth agenda and local delivery.

Summary of comments:

- Disagreement re number of homes.
- Where will jobs come from?
- Need for A11 dualling.
- Negative perceptions of the town.
- Administrative boundaries need to be reviewed.
- Concern re allocations – all to the north gives an un-balanced town.
- Unsound approach with regards to the Stone Curlew Buffer.

Response and way forward:

The growth plan for the town was consulted on and has been agreed and found sound during the production and subsequent Examination in Public of the Core Strategy. The Core Strategy was adopted in December 2009 and requires the TAAP to look into the detailed policies and land allocations to enable that growth. The TAAP has to be prepared in conformity with the Core Strategy.

An Employment Topic Paper is to be produced to support the TAAP. This Topic Paper will supplement evidence in the Council's Employment Land Review and associated sub-regional projections.

The Government have indicated that the A11 will be dualled by 2015. The TAAP plans for change up to 2026. The phasing of the growth shows that the majority of development will be delivered in the later stages of the plan period. This coincides with the dualling of the A11 as committed to by the Government.

Different people have different perceptions about the town. The TAAP looks to address the issues raised (such as '*who will be attracted to Thetford?*', '*Thetford has become a sink town*' and general negative comments on the town centre) with the ultimate aim of improving the town's reputation to those looking into Thetford as well as its residents.

The TAAP is a Development Plan Document and will not address the administrative boundaries of the town. BDC are to undertake a Governance Review around the District and this issue will be addressed as part of that review.

The growth strategy and the location of Urban Extension are already determined through Core Strategy. The TAAP is more about the detail of how and when development and regeneration will take place. Specific decisions on the locations of growth are a reflection of the considerable environmental and technical evidence.

With regards to the Stone Curlew, no new empirical evidence has been prepared and therefore no local evidence to support an alternative approach to the Stone Curlew buffer in Thetford to that found sound in the Core Strategy.

### **3. Settlement Boundary**

Summary of comments:

- Some suggested changes to the north of the town to include the junctions within the Settlement Boundary.
- Gallows Hill should remain outside of the Settlement Boundary.
- Gallows Hill should be inside the Settlement Boundary.

Response and way forward:

Agreement with some of the proposed changes to the Settlement Boundary to the north of the town (namely including the junctions within the Settlement Boundary). Disagree re including Gallows Hill within the Settlement Boundary. The purpose of the Settlement Boundary is to define in policy those areas of the community where the principle of further development is likely to prove acceptable in principle. English Heritage advises to keep the Scheduled Monument out of the Settlement Boundary to further protect this area.

Broom Covert has been placed inside the Settlement Boundary as there is a development with planning permission which has started.

### **4. Housing Trajectory**

Summary of comment:

- How is the trajectory linked to phasing?

Response and way forward:

The housing trajectory will be refreshed and improved and linked more obviously to the phasing of the growth.

### **5. Masterplan and phasing**

Summary of comments:

- Concern that all development is to the north of the town which will create an imbalance
- Concern re loss of agricultural land
- Detailed points on masterplan
- Town will become dormitory for other places
- Concern that development is going to stretch too far along Kilverstone Road

Response and way forward:

Growth strategy and location of Urban Extension is already determined through Core Strategy. The TAAP is more about the detail of how and when development and regeneration will take place. Specific decisions on the locations of growth are a reflection of the considerable environmental and technical evidence.

It is recognised that growth in Thetford will result in loss of agricultural land, however there has got to be a balance between the delivery of homes and jobs in sustainable locations and the loss of land. The land around Thetford is also towards the lower end of grades for agricultural land.

The detailed points on the masterplan have been forwarded to the landowners who are producing the planning application and have also been raised as part of the Planning Performance Agreement process.

The whole document is pulling towards achieving a high level of self containment - employment land provision, services, town centre regeneration, transport links, education. Thetford already has good levels of self containment and the Area Action Plan seeks to guide investment which will support the regeneration and revitalisation of the town.

The phasing shows that the area to the east along Kilverstone Road is the last phase of the development. Considering the land budget and the suitability of the land, this is a reasonable option to include.

# Comments on Thetford Urban Extension Policies

Please Note the reference is to Policy Numbering in the Draft Final TAAP (January 2011).

## **6. TH1: Thetford Urban Extension Strategic Design Principles**

Summary of comments:

- Suggestions re expanding policy or combining with other landscape and design guidance policies.

Response and way forward:

TH1 has been expanded slightly to include some of the comments as well as amalgamating with TH3.

## **7. TH2: Locally Distinctive Features of the Landscape**

Summary of comment:

- General support for this policy, although concerns that management plan too onerous and should be town wide policy.

Response and way forward:

Given the local evidence and the distinctive landscape within the Urban Extension, a management plan is not considered to be an onerous requirement.

After further consideration, this will remain as a Thetford Urban Extension policy. Some areas of undesignated open space elsewhere in the town (including trees and hedges) will be allocated as open space on the Proposals Maps. Policy DC12 of the Core Strategy on trees and landscaping will apply to Thetford as well.

## **8. TH3: Structural Tree Planting as part of the Northern Development**

Summary of comments:

- General support of principle, but should be the right species, should not affect archaeology and also could combine with TH1.

Response and way forward:

TH3 will be combined with TH1 and the issues raised addressed in the supporting text.

## **9. TH4: Gallows Hill Scheduled Monument (SM)**

Summary of comments:

- Queried why Gallows Hill deserved own policy.
- Support for policy.

Response and way forward:

As well as being an archaeological site, it is also a locally important area for a nationally scarce breed of beetle. Therefore this site is important for biodiversity as well as archaeology. Furthermore, this SM is close to the Urban Extension and so guidance is needed to ensure its setting is improved/enhanced. The policy is supported by English Heritage. No change to policy.

## **10. TH5: Existing Buildings in the Thetford Urban Extension**

Summary of comment:

- General support.

Response and way forward:

No change.

## **11. TH6: Surface Water Management**

Summary of comments:

- Support.
- Concern this is duplicating TH34 Water and Drainage.
- Support of relevant Initial Habitats Regulations Assessment (HRA) findings which should be taken on board in the policy wording.

Response and way forward:

Given the scale of development of the Urban extension it is felt that it warrants a Surface Water Management Plan (SWMP) and this policy. HRA will influence the policy.

## **12. TH7: Walking and Cycling**

Summary of comments:

- Some language used could be stronger e.g. encourage not accommodate.
- Technical standard is required for cycling.

Response and way forward:

NCC are producing a guidance for cycling which combines the different guidance that already exist, produced by various organisations. Wording in policy has been amended in response to comments received.

## **13. TH8: Buses**

Summary of comments:

- Disagreement about the bus being more of an alternative to the car than cycle.
- A public transport hub in the Urban Extension as recommended in transport work not included in TAAP.
- Some internal and external destinations and routes suggested.
- Agreement with the proposed approach.
- Concern about sustainability of services
- Uncertainty about deliverability

Response and way forward:

Bus services in Thetford are currently not as good as they might be, due to the layout of the town and the circuitous nature of the routes and with improvements, buses could have the greatest potential in Thetford to help achieve modal shift, particularly as the layout of the growth could be designed to enable good direct bus services.

The public transport hub issue was discussed between HA, NCC, BDC and the landowners. It is proposed that near to Tescos, a facility for buses to park over night could be provided. As for an interchange, it was felt that such a use is better located in the town centre and an additional bus interchange elsewhere in the town is not needed.

The destinations have been fed into the planning application – the landowners intend to improve some bus service provision in the area to attain modal shift.

The trigger points for a switch from developer subsidised service to sustainable profit making service will be addressed through the legal agreement on the planning application. Contributions to public transport will also be considered in the emerging Community Infrastructure Levy (CIL) work to draw down contributions from other developments. The Thetford Transport Study (2010) to which Norfolk County Council were a primary partner, identified that a ten minute frequency of internal bus service was necessary to achieve the modal shift required to secure a deliverable and affordable transport network.

The landowners have confirmed that buses will form a core function in ensuring the Urban Extension can be delivered. The precise approach is detailed in the planning application.

## **14. TH9: Bus Design Principles**

Summary of comments:

- Agreement with the proposed principles.
- Caution from NCC re what can be funded through from public revenues.
- Such facilities should be retrofitted to the rest of the town.
- Bus stop every 400m too frequent.
- Queries re the effect of bus priority measures

Response and way forward:

Whilst the TAAP does not explicitly refer to retrofitting such bus facilities to the rest of the town, the supporting Commitments Paper recommends such retrofitting.

The system proposed by the landowners can easily be joined by other bus operators and routes. Some destinations around the town are likely to be fitted with such facilities.

The proposed bus boarders will have the effect of holding cars behind the buses, so with frequent bus stops very close to people's houses, it is not agreed that bus journeys will be longer than car journeys and favour driving instead of taking the bus.

With regard to bus priority, observations of behaviour are very location dependent and can be subjective. It is proposed to take road space away from general traffic and re-allocate it to buses. This has the double effect of improving conditions for buses and making conditions slightly less favourable for shorter, single occupancy car journeys - in the hope that they might decide to change mode. For already congested junctions we will need to carefully consider whether bus priority is appropriate or not.

TH9 has been combined with TH8 to have one policy on buses in the Urban Extension.

### **15. TH10: A New Railway Station in the Urban Extension**

Summary of comments:

- Many queried the need for this (12 such comments).
- Some agreed with it (6 such comments).
- Many questions asked about who would fund, land take and Network Rail involvement.

Response and way forward:

This policy is about making sure the ability to do this in future is not compromised. The policy seeks to safe guard a piece of land to accommodate this proposal. The priority remains improving the existing station. This is not a short to medium term proposal, more a longer term proposal which is at the concept stage. A new station would be Developer funded. The concept requires greater detail investigation and discussion with network rail and operators. An Initial assessment shows that there is not a big impact on train times and that any impact could be made up at other parts of the journey. Whilst residents may not go to Norwich or Cambridge on a daily basis, such a proposal might help that commute for other journeys. No change to policy.

### **16. TH11: Changes to the A11 Trunk Road**

Summary of comments

- Concern that modelling based on existing travel patterns.
- Concern about the introduction of lights on roundabouts.
- All junctions should be grade separated/fly overs
- Detailed questions re funding, phasing, timing and delivery
- Proximity of works to the SPA and SAC (Brandon Road/A11 junction)
- Timing of TH11 and TH12

Response and way forward:

Modelling has been based on a 30% modal shift from single occupancy car use which is a significant betterment on the existing situation.

The TAAP covers the period to 2026 during which time background growth on its own would result in issues on the trunk road. Transport evidence identifies that signalisation is a mechanism to ensure junctions work at peak periods in the future. In principle lights are acceptable to the Highways Agency as a mechanism to maintain flows and are the most cost effective way of getting the most out of junctions.

Some aspects of the detailed information on the delivery of the junction improvements are beyond the TAAP and more for the planning application. Landowners have indicated that their planning application will include delivery, phasing and timing and that improvements will be funded by the development.

Impact of the changes to the Brandon Road/A11 junction on SPA and SAC designated land is a significant issue. Additional information has been gathered on the immediate quality and density of qualifying features in the likely area to be affected by the junction improvement. The impact of the proposed junction and any associated mitigation will be the focus of the Appropriate Assessment and the policy has been amended.

Text to be changed to ensure consideration is given to changes on the Local Road Network being phased as appropriate.

### **17. TH12: Improvements to the Local Road Network**

Summary of comments:

- Need for some form of Southern Link Road
- HGVs down Bury Road
- Timing of TH11 and TH12
- Concern re introduction of traffic lights
- Existing traffic management issues.
- NCC envisages further transport work for Norwich/London Road being part of town centre masterplan
- Concern re impact of changes on historic environment

Response and way forward:

Southern Link Road would be undeliverable in terms of the impact on landscape, impact on biodiversity and magnitude of cost. The Transport Study has produced a strategy that delivers the requirement of the TAAP without the need for such a road.

HGVs along Bury Road are a current traffic management issue, already known to Norfolk County Council.

Text to be changed to ensure consideration is given to changes on the Local Road Network being phased as appropriate.

The TAAP covers the period to 2026 during which time background growth on its own would result in issues on the local road network. Transport evidence identifies that signalisation is a mechanism to ensure junctions work at peak periods in the future. In principle it is acceptable to the highways authority.

The Policy itself mentions potential constraints at each location, including the historic environment. Supporting text will be improved to emphasise this issue.

### **18. TH13: New Employment Land**

Summary of comments:

- Employment areas should allow food stores.
- TEP has not been developed in the last 20 years and foodstore would help.
- Strategy for attracting new businesses.
- Need to use vacant employment sites.
- Concern re location of employment land.
- Concern re existing allocation E1 and proximity to Gallow's Hill.

Response and way forward:

The potential of the wider urban extension to provide the necessary infrastructure to bring forward the required employment land should not be discounted. Positively allocating an out-of-town location for retail development on a key employment site would reduce the flexibility in employment land supply and result in a negative impact on the town centre. Evidence in the 2010 Retail and Town Centre Study points to some fragility in the performance of Thetford Town Centre. A key strand of the adopted Core Strategy and the Thetford Area Action Plan in terms of spatial vision for Thetford is "the major regeneration" of the town centre to become a revitalised hub for existing and new communities. Further significant new retail floorspace at a peripheral out of town location which is both poorly related to existing and new communities (physically separated by existing industrial development and infrastructure) is not in accordance with the the Vision. The Council accepts that some limited out of town centre retailing is required as part of the urban extension to meet local day-to-day needs and this is reflected in the TAAP and Masterplan for the Urban Extension.

Should evidence support the need for additional retail floorspace beyond that capable of being accommodated in the town centre then the preference would be to look to embed such a requirement within a centre well-related to populations as the town grows rather than remote, peripheral locations which will inherently rely on car based trips. In terms of other commercial uses such as hotels, the Council could look positively on such a use on TEP in accordance with Policy DC8 of the adopted Core Strategy which allows for hotel accommodation which primarily seeks to meet the needs of road users.

The potential of TEP to come forward within the wider context of adjoining development should not be discounted. The successful delivery of the urban extension is dependent on a balance of homes and jobs to not only create a vibrant economy and society for Thetford but also to help self-containment which is essential to ensuring that future transport infrastructure investment is kept at a viable and realistic level (as evidenced in the Thetford Transport Study 2010). The inherent linkages between the delivery of the urban extension and TEP are further reinforced by the ability of the urban extension to resolve key infrastructure issues such as energy and waste water. Planning approval for the TEP has recently been renewed and the Council has adopted a positive policy in the TAAP to encourage a range of uses.

Whilst PPS4 refers positively to retail operations under the umbrella of employment, the Council is mindful of particular local policy and evidence in relation to Thetford and the need to support and regenerate the town centre. Any dilution of this approach is likely to setback investment and the much needed regeneration of the town centre which the Community has strongly identified as a priority through the extensive consultation to date on the TAAP.

An employment Topic Paper will be produced to set out the approach to employment in the area and support the TAAP.

Policy TH40 seeks to produce plans for the existing employment areas what will result in change over time.

There is a need to release 40ha of new employment land as part of the strategy to deliver 5,000 new jobs in Thetford to 2021. TEP and the extension to Lodge Way off Mundford Road will provide for some two thirds of this 40ha requirement and therefore there will be a need to identify and allocate additional employment land across the urban extension. The strategy of releasing new parcels of employment land in locations well related to the A11 is supported by the Council's Employment Land Review which states that sites visible to the A11 will be attractive to prospective businesses. The precise balance and location of employment land within the urban extension will be reviewed in taking the TAAP forward to the next version but the principle of a scale of employment land release adjacent to the Croxton Road junction is not unreasonable. Although not an issue for the TAAP, specific traffic management measures (such as weight restrictions) could address specific concerns about impact on Croxton Road.

The allocation will be amended to reflect the Scheduled Monument designation and consequentially the shape of Site E1 being amended to deliver the requisite employment land. Section 37 needs to be updated to reflect the saved policy will be replaced.

### **19. TH14: New Local Centre in the Urban Extension**

Summary of comments:

- Query retail study findings in terms of the retail capacity of the town and also the methodology used.
- Concern that local centres would compete with town centre
- Objection to comparison goods in local centre
- Better wording re acceptable land uses at local centres
- Town Centre should be the place for comparison shops

Response and way forward:

The information provided by NLP is considered robust and is based on latest available information on the scale of development to be planned for in the urban extension. The Thetford Enterprise Park is identified as a General Employment Area on the Proposals Map and forms part of the wider requirement for employment land in the town as it grows, and as such its release for retail development would not be in conformity with the adopted Core Strategy DPD. Therefore, there is no need to reconsider the underlying evidence base nor its findings.

The intention of the local centre is to provide new retail provision for those living in the urban extension. The intention is to complement not compete with the town centre and to provide genuinely local facilities.

It is considered appropriate that some level of provision could be made within a local centre to include other A class uses or comparison goods as part of wider mix of development, particularly where this would be consistent with providing local services and facilities to serve residents in the urban extension.

Policies contained within the Council's Core Strategy as well as national policy provide suitable protection for the town centre. However, providing a quantum of new floor space in the urban extension will provide for local facilities for those residing in the urban extension to complement, rather than compete with the town centre.

In response it is proposed to reduce the scale of retail floorspace in the Local Centres given latest evidence that some town centre opportunities identified in the 2010 Retail and Town Centre Study are now likely to come forward sooner rather than later. It is recognised that Local centres have a legitimate role to play in providing local convenience and comparison and the key issue is one of scale and ensuring that the town centre remains a focus for investment and activity and that a scale of retail development does not occur within the urban extension which is potentially harmful. Consequently, the amount of comparison (non-food) floorspace within the Local Centre has been reduced to 500sqm.

### **20. Water – Urban Extension**

Summary of comments:

- Concern re routing of waste water pipes near to area of historic interest.

Response and way forward:

Amend section to highlight this area as one of historical interest and that discussions with English Heritage and Norfolk County Council should be held early on.

### **21. TH15: Energy and Carbon – Thetford Urban Extension**

Summary comments:

- Combine with other related policies.
- New build should be more energy efficient.

Response and way forward:

On reflection, the building regulations will be tightened by the Government over the coming years and development is required to meet the building regulations at the time. As such, this policy has been removed.

There is no local evidence base that would justify requiring the energy efficiency measures of new homes to go beyond that required in the national programme of step change tightening of the building regulations.

## **22. TH16: Decentralised Energy Supply**

Summary of comments:

- Decentralised energy needs to be appropriately sited.
- Combine with other related policies.
- Mention of the CHP proposal on Mundford Road.
- New build should be more energy efficient.

Response and way forward:

This policy does not promote new CHP power stations, rather requires development to be able to fit to such infrastructure of various scales. There are national and Core Strategy policies that guide CHP proposals such as those on Mundford Road. In light of the confusion, the name has been changed to 'Connecting to a Decentralised Energy Supply' and extra text about the policy not promoting CHP power stations added.

There is no local evidence base that would justify requiring the energy efficiency measures of new homes to go beyond that required in the national programme of step change tightening of the building regulations.

## **23. TH17: Education Provision in the Thetford Urban Extension**

Summary of comments:

- NCC provided updated evidence base.
- Some lack of support for central education facility.
- St Edmundsbury concerned that more Thetford residents will travel to Bury St Edmunds for education services.
- Concern re lack of number of dwellings to trigger new school information.
- Queries re setting aside land and monies for school development.
- Queries re plans for Charles Burrell School if Academy moves to the north of the town.
- No mention of funding
- Improve emphasis on sustainable modes of travel to get to schools
- Concern re transport to schools if combined on one site.

Response and way forward:

NCC revisiting their evidence base and the TAAP will reflect any new evidence from NCC. The central education site (the Forum) is not part of emerging plans for education in the town following the Government funding announcement for Academies in February 2011.

It is acknowledged that Thetford residents will indeed travel to other towns or cities in the area for higher order services including education provision not offered in the town. The transport sections of the TAAP identify ways to attain modal shift – including a review of public transport in the area and the destinations served.

Regarding the number of houses required to trigger schools, the TAAP responds to evidence provided by NCC education experts who requested this clause was removed. The decision to remove the statement about when the first primary school will be built enables NCC to have maximum flexibility as to when any new schools are built and how NCC accommodate children arising from the early stages of the development. NCC are currently working with Raleigh and Drake Infants and Admiral's Junior to see whether the urban extension gives us an opportunity to create additional capacity in these schools through reorganisation, perhaps to primary schools. Feasibilities studies are currently being undertaken. The outcome may be that it is not possible to reorganise the schools but NCC do not want to assume that the answer to the urban extension is simply to build three new schools, especially if this is detrimental to existing schools. In addition, NCC have limited evidence to predict how many children will arise from the first hundred houses. It could be very few depending on the type of housing built in the first phase and these could possibly be accommodated in existing provision. On the other hand NCC may well need a new school by the time the first hundred houses are built. The revision of the wording does not preclude this option.

NCC education experts are heavily involved in the production of the TAAP as well as the Planning Performance Agreement. The more detailed policy in the main Draft Final TAAP gives more details on school provision. There is some capacity in some of the primary schools for the first houses. NCC will monitor the situation closely.

Plans for Charles Burrell School are yet to be prepared. The TAAP will include some reference to the school in the Existing Residential Estates Policy given that it is likely to change following the Academy funding decision.

Emphasis on sustainable modes of travel to get to school improved.

A section on funding has been incorporated.

How pupils will travel to the new school is beyond the remit of the TAAP. A Travel Plan is likely to be required by NCC.

#### **24. TH18 – Health Provision**

Summary of comments:

- NHS provided updated evidence base.
- Concern about time to wait to see a GP now and lack of confidence that there is capacity at the Healthy Living Centre (HLC).
- St Edmundsbury concerned more Thetford residents travel to Bury St Edmunds for Health
- Concern re the review of the HLC
- Concern that NHS services paid through CIL
- Potential to combine this policy with other acceptable uses in a Local Centre.

Response and way forward:

Updated evidence base will be discussed with NHS Norfolk and used to update the TAAP.

Comments on existing situation passed on to NHS Norfolk as this issue is beyond the remit of the TAAP. Evidence provided by NHS Norfolk has suggested that there is capacity until 2016.

As no hospital is proposed for Thetford, residents will indeed travel to Bury St Edmunds and Norwich for such health care. NHS Norfolk are to review the use of the Healthy Living Centre with an aim of improving how the building is used and also the types of service on offer to the town's residents which could reduce the need to travel to Norwich or Bury St Edmunds. The transport sections of the TAAP identify ways to attain modal shift – including a review of public transport in the area and the destinations served.

It became evident during the consultation that the summary of this policy in the summary leaflet that was delivered to homes in Thetford and surrounding Parishes gave cause for concern, in particular where it said the HLC will be reviewed. Residents interpreted this as the Centre not being used for health in the future. NHS Norfolk are to review the use of the Healthy Living Centre with an aim of improving how the building is used and also the types of service on offer to the town's residents which could reduce the need to travel to Norwich or Bury St Edmunds. This was explained adequately in the full version of the TAAP.

Prioritisation for how CIL funds used will be part of the CIL background work which BDC has commissioned. To some extent addressed in the Breckland Integrated Delivery Document (BIDD).

This is the town wide health facility approach, but will be delivered in the Urban Extension. This will be moved to the Town Wide section of the TAAP and placed in the same section as 'Healthy Lifestyles' policy.

#### **25. TH19 – Community Buildings**

Summary of comments:

- Potential to combine this policy with other acceptable uses in a Local Centre.
- Support.
- Concern re schools allowing their facilities to be used – cannot guarantee this.

Response and way forward:

This policy is the approach to community facilities in the Urban Extension and it is therefore prudent that it has its own policy. Acceptable uses at Local Centres (and small shopping parades) will be included in the Local Centres policy.

There is capacity within existing community facilities according to the 2010 audit. Policy approach does not stop the provision of new community facilities - the preference is to share existing and new facilities, particularly with schools. If this is not possible or there is greater demand, there is guidance for stand alone facilities.

#### **26. TH20 – New Bring Recycling Centres**

Summary of comments:

- Potential to combine this policy with other acceptable uses in a Local Centre.
- In relation to waste and recycling, NCC request TAAP includes paragraph on their commitment to improving household waste and recycling centre.
- Needs to be properly managed.

This policy is the approach to bring recycling centres in the Urban Extension and it is therefore prudent that it has its own policy. Acceptable uses at Local Centres (and small shopping parades) will be included in the Local Centres policy.

TAAP will include reference to the new household waste and recycling centre.

Policy will be improved to emphasis good management of such sites.

## Comments on TAAP Wide Policies

### 27. Integration of existing and new residents

Summary of comments:

- Concern that growth will result in two communities – a ‘them and us’ mentality.
- With all that is to be provided in the Urban Extension, why would people come to the town centre?

Response and way forward

The next version of the TAAP will have an improved community cohesion and integration section. There is also a role in the relevant organisations preparing for the development to address this potential issue – i.e. some aspects are beyond the remit of the TAAP, but more for the delivery of the changes.

The TAAP proposes the provision of health facilities, community facilities and shops in the Urban Extension. The town currently has small shopping parades/local centres in the estates providing such services as convenience food, community facilities and takeaways.

The provision of some other services in the Urban Extension could reduce the need for residents to travel far and could help address the approach set out within the TAAP which seeks to reduce the need to travel, distance travelled and seeks to change the mode of travel away from single occupancy car use.

It is proposed that a town centre masterplan be produced to guide changes to the town centre to improve its offer and attractiveness and to reverse the leakage of expenditure to nearby towns

### 28. TH21 – Approach to the Town Centre

Summary of comments:

- Widespread disappointment about the state and offer of the town.
- Concern re costs of rates and rents and effect on town centre offer
- Feelings that Riverside complex lets the town down.
- Action needed now.
- Disagreement that Thetford Retail Park is part of Town Centre
- Move market to King Street
- Car parking
- Poor choice of shops – residents shop elsewhere
- Concern re more moneys spent on masterplan and if it will be delivered.
- Town centre needs improving now and prior to urban extension
- Concern re effect of out of town supermarkets
- Suggestions to consider as part of town centre masterplan
- Disappointment at lack of cinema and restaurants
- Carnegie Room – support for the type of facility, wish for refurbishment.
- Concern that improving Thetford Retail Park could affect town centre.
- Some against thought of multi storey car parks.
- Disappointment at lack of local shops
- Town centre needs to be more permeable to walking and cycling
- EH would like to be involved.

Response and way forward.

The Council are aware that residents are disappointed about the town centre and what it offers. The retail study confirms that much expenditure is leaked to nearby larger towns and cities who offer better shopping as well as better leisure facilities. The Council acknowledged that Thetford does not have a cinema or bowling alley, but some other smaller towns do – this is down to the Market and those particular businesses, although the changes proposed for Thetford could see such uses attracted to the town.

Regenerating Thetford town centre is a priority for the Area Action Plan and policy TH21 sets out a clear and comprehensive approach to the town centre, including those areas suitable for significant intervention and investment

and the guiding principles against which development proposals will be assessed. Breckland Council considers that the TAAP provides a clear and robust planning framework which will enable the private sector to make investment decisions and bring other retail and leisure outlets to the town centre. Outside of the TAAP Breckland Council now owns a number of the key regeneration sites and is actively looking at ways to bring these sites forward in accordance with the TAAP.

The Council are in the process, at the time of writing, of gathering funds to produce a town centre masterplan. Whilst the comments on concern regarding the cost of such a study and queries as to previous studies are noted, this masterplan would include a delivery section and implementation plan to show how changes will be instigated and delivered in the town centre. Previous work and ideas will inform the plan. The plan will also cover other issues such as addressing car parking. Other general comments in relation to the views of the public being taken into account are noted and the masterplan will take into account all comments made in relation to the Draft Final TAAP as well as involve and consult with locals – the exact approach is yet to be determined.

It is anticipated that the masterplan work will start towards the end of the summer and could take up to a year to produce. With the planning application for the Urban Extension also likely to take a long time to determine, it is likely that the Town Centre Masterplan will be completed in good time in relation to other changes proposed for the town.

The Carnegie Rooms are owned and managed by Thetford Town Council. Breckland Council understands that the Carnegie Rooms require considerable investment going forward and the TAAP identifies the site as an area for change and development. This does not mean that the Carnegie Rooms have to be replaced but the Plan intends sufficient flexibility to enable the Town Council to look at a range of options for the site. Should the site be redeveloped, it should be noted that the TAAP identifies the area including the Carnegie Rooms as a focus for market and community uses and Breckland Council would seek replacement provision either on the site or very close by. Alternatively, proposals to refurbish and rejuvenate the existing Carnegie Rooms would also be supported. The detailed comments in respect of the highways network will be forwarded to Norfolk County Council as the Highways Authority.

The Thetford Retail Park is close to the town centre and within reasonable walking distance. As such, the Council includes the Thetford Retail Park as part of the Town Centre.

Policy TH21 identifies a number of key town centre sites that provide the key opportunity areas for development and change. These include Riverside Walk and other river frontage sites. The Council recognises that improving the riverside environment is critical to the successful regeneration of the town centre.

Thetford has a range of small surface car parks scattered across the town centre and the principle of focusing these sites into a smaller number of facilities including either multi-storey or decked facilities should be explored.

Whilst moving the Market to King Street could have its merits, it is unlikely to be practical. The Thetford market is held every Tuesdays and Saturdays. Consideration needs to be given to the retail businesses who pay high rent and rates to trade in King Street and it might not be fair on them if stalls selling competing goods was set up in front of a similar shop. Furthermore NCC could not want goods vehicles and vans permanently driving on the pedestrian area. It is a chartered market and the place for the market is Market Place. The stalls are moved into King Street when the market place is being used for special events like in June when British Legion want to celebrate their 60th anniversary. Not all the market stalls would want to move and many of the stalls are too big to fit in small gaps.

Promoting walking and cycling are key to the TAAP. The Town Centre is probably the key destination on the Walking and Cycling Network. As such, the Masterplan will look at ways of making the town centre more permeable to these modes of transport. Investigation into allowing cycling along King Street at certain times (similar to Gentlemen's Walk in Norwich) could be included in the Masterplan.

The detailed suggestions for the town centre and the desire of some organisations to be involved in the planning for change of the town centre have been passed on to relevant officers.

## **29. TH22 – New retail Development**

Summary of Comment:

- Query retail study findings

Response and way forward.

The policy approach in TH22 is considered appropriate based on the Council's evidence base. There is no indication that a strategy which identifies significant additional retail floorspace in order to 'clawback' expenditure outside of the district is sustainable or would achieve this aim. Such a scale of floorspace would be unlikely to be accommodated in Thetford without causing harm to the town centre. The competing centres of Norwich and Bury St. Edmunds exert significant influence over settlements in this area, and at this time the Council considers that the most appropriate

strategy is to try and maintain the existing levels of retention without leaking further expenditure outwards. The approach would be reconsidered through future reviews of the Council's Core Strategy and supporting evidence.

### **30. TH23 – Transport – Achieving Modal Shift**

Summary of comments:

- Highways Agency (HA) suggest extra modelling work is required.
- HA suggest some destinations for improved buses
- Extra destinations for improved buses suggested.
- Support for proposed walking and cycling network.
- Some comments on how people will still drive and still need their car and need parking.
- Not only about modal shift, but reducing the need to travel and the distance travelled.
- Caution from NCC re what can be funded through the public revenues.
- Comments on some of the detailed wording
- Mitigation will be required where the modal split forecasts are not met within a reasonable time period.
- A Stick and carrot approach is needed to get modal shift

Response and way forward:

A meeting is to be held to discuss these issues and agree a way forward between all relevant parties. The results of this meeting will be reflected in the next version of the TAAP.

The suggested destinations for buses are noted and have informed the TAAP and the PPA process.

Some improvements to the Walking and Cycling Network have been made to reflect the comments and make the plan more user friendly.

With regards to the likelihood of attaining modal shift, it is acknowledged that some of the community could easily change mode of transport, but others may find it difficult. Of course there will be some who are unwilling.

This section of the TAAP will be improved to reflect that reducing the need to travel as well as the distance travelled are of importance to the TAAP as well as attaining modal shift.

Local road network capacity will increase and be different even with changes as per TH12 which will provide an element of 'stick'. Car parking review will be part of town centre masterplan and could see consolidation.

### **31. TH24 – The Impact of Change on Pedestrians, Cyclists and Buses.**

Summary of comments:

- Some support.
- Should be deleted.

Response and way forward:

Policy TH23 aims to deal with development across the Area Action Plan area and ensure that all development contributes to the measures needed to deliver and secure a transport network in the town which supports and enables the significant modal shift required. It is acknowledged that elements of TH24 are very closely related to TH23, however, Breckland Council considers that the specific measures for walking and cycling need to be distinctly presented in policy to ensure due consideration. There is a risk that embedding TH24 within a wider TH23 may reduce the impact and visibility of the policy requirements.

### **32. TH25 – Thetford Bus Interchange**

Summary of comments:

- Leave bus station where it is
- Some support for moving interchange.
- River side ideal as location for the bus station as it is a pretty welcoming area
- Use the Anchor for café and toilets etc
- New bus interchange needs café, waiting room, toilet and be manned.
- Provide a bus interchange similar to Bury St Edmunds
- Need drop off points
- Proposal is inadequate in size for a growing Thetford.
- Concern re conflict between buses and pedestrians near Iceland area.
- NCC unlikely to support bus ticket vending machines
- Proposed new site has many weaknesses
- Support for repairing Cosy Carpets.
- Anchor could be a Tourist Information Office.

#### Response and way forward:

The desire to retain the existing bus station is noted. However it is of poor quality and does not reflect well on the Town or public transport use. A new modern interchange with sufficient capacity to cater for the planned growth of the town is required. The existing site is constrained, by adjacent buildings (one of which is listed), flood zones (along the river frontage) and by the existence of a scheduled ancient monument. Without significant demolition of buildings the existing facilities can not be improved to provide a high quality interchange of sufficient capacity to cater for the planned growth and regeneration of the town. If building demolitions occurred to achieve a suitable site assembly for a new bus interchange the regeneration potential of this important town centre site and the opportunity it provides to significantly enhance the river frontage and wider revival of the town centre would be compromised.

The views expressed are being listened to and acted upon accordingly. It should be noted that during the initial widespread public feedback at the start of the Area Action Plan process in 2008 some 75% of the 1,000 respondents supported the idea of relocating the existing bus station site.

An assessment has been completed in support of the proposed Bus Interchange on land off Minstergate and St Nicholas Street. The assessment shows that the new facility will not adversely affect the operation of the adjacent highway network.

The new Bus Interchange will be able to cope with the largest buses and coaches permitted on Britain's road network and has been designed to take account of the adjacent users.

Public toilets, that will be maintained by Thetford Town Council, are to be provided as part of the new Bus Interchange. Public transport information, including real time bus information, will also be provided along with covered passenger waiting facilities.

The design of the new Bus Interchange and the work planned for Minstergate and St Nicholas Street (including the adjacent junction onto Norwich Road) will be safe for pedestrians and other road users. The proposals being developed have been subject to an independent safety audit and two full scale 'mock up' trails carried out with a local bus operator the recommendations of which have been incorporated into the design as it has developed.

The proposals being developed for the new Bus Interchange on land off Minstergate and St Nicholas Street will provide a high quality and accessible facility within the Town Centre and within easy walking distance of the rail station. The proposals being developed will provide high quality and covered passenger waiting facilities and public toilets that will be maintained by Thetford Town Council. The desire for additional public/community uses is noted. The future use of the former 'Cosy Carpets' building has not yet been determined. A number of organisations have expressed an interest in taking over responsibility for this building once it has been restored and a factor in determining its future reuse will be the opportunity it will give to provide a greater range of public facilities over and above that been provided directly within the interchange.

The assessment work carried out in support of the new Bus Interchange demonstrates that the operation of the new facility will not cause a traffic problem at the Minstergate / Norwich Road junction.

The new Bus Interchange will incorporate public car parking facilities for those dropping off or greeting people travelling by bus or coach. The capacity of the five bus bays within the new facility exceeds that required to cater for the planned growth of the town.

Restoring the 'Cosy Carpets' building is a major and costly undertaking. However the building is an important part of the town's heritage and bringing back into use as part of the Bus Interchange project will help improve and stimulate the regeneration of this part of the town centre. The Cosy Carpets building is a Grade 2 Listed former Maltings building and despite recent damage it should be retained and given a new lease of life.

The Cosy Carpet building is integral to the successful development of the wider site. It remains appropriate that the policy makes reference to these buildings. The restoration of the former 'Cosy Carpets' building is an integral part of the new Bus Interchange project, but is not likely to form part of the bus interchange facilities; the future use is still to be determined, but this project offers the opportunity to regenerate that part of the town.

The scope and nature of financial support arising from planned development has not yet been defined and may well provide the opportunity to fund elements of public transport service, like vending machines, which will further assist the shift to sustainable forms of transport.

### **33. TH26 – Thetford Railway Station**

#### Summary of comments:

- Pedestrian, cycle and bus links to both sides of the railway station are important, not just for example from the town centre to the southern platform..
- Access between platforms important

- Cars parked on Station Road blocks traffic
- Questions where extra parking could go.
- Support to improving station buildings and bringing them into use
- Do not take allotment land
- Approach nearby Church as they have large Car Park

Response and way forward:

BDC supports an increased use of the station and the appropriate occupation and revitalisation of existing station buildings. Whilst other forms of transport will be encouraged, it is important to recognise that cars will continue to be used as a means of accessing the station by residents within Thetford and the surrounding area. It is recognised only available areas for parking close to the station are commercial land or allotments, BDC would ensure compensatory provision for allotments or helping existing businesses relocate to an employment area.

The Church of the Latter Day Saints has been approached about potential use of the car park, but did not wish for their car park to be used in such a way.

Access between platforms is included in full policy wording in the main document and the TAAP would allow for favourable consideration of proposals to improve access provided it respects the heritage asset of the listed buildings.

Walking, cycling and bus access to both sides of the train station from different parts of the town is a valid point which will be included in the TAAP.

### **34. TH27 – Healthy Lifestyles**

Summary of comments:

- Could be combined with Primary Care policy
- Requirement to fill out questionnaires and undertake an impact assessment are onerous
- Agreement with the policy.
- A new policy is required to make clear the range and quality of green infrastructure in the SUE and to amplify the Core Strategy policies.
- Implementation practicalities of this policy to be checked with NHS and Breckland Development Management Consultants.

Response and way forward:

The process requires developers and designers to take on board health issues and try to address them in the design of the development as there are clear links between design of development and health.

This will not be combined with a primary care policy, but both issues will be included in the same section. This policy is more about lifestyles rather than the provision of facilities.

Emergency services information will be included in a separate section.

The policy is an appropriate response to local evidence on health in Thetford as set out in the Sustainability Assessment and which were underlying reasons for Thetford achieving Healthy Town Status. No evidence to say it will be an onerous requirement on the more complex developments, but recognise need to clarify supporting text.

Regarding type of open space, the Open Space and Green Infrastructure typology is picked up elsewhere in the TAAP through specific policies on allotments, landscaping etc. the adopted Core Strategy also has a robust policy on open space provision which will apply in Thetford. .

### **35. TH28 - Allotments**

Summary of comments:

- Agreement with policy approach.
- Allotments should be close to residents
- Some comments re Ramsey Close issue

Response and way forward:

It is now proposed that the Ramsey Close land will be transferred over to the Town Council. There is a covenant on the land that it must be used to benefit young people. How the land will be used is yet to be determined.

The full policy in the main document includes being well related to existing and or new residents and having good access by foot and cycle.

### **36. TH29 – Joe Blunt’s Lane**

#### Summary of comments:

- Much background information on Joe Blunt's Lane provided by Norwich Road Residents Association.
- Norwich Road Resident's Association suggested some extra wording.
- Supported
- This policy duplicates other policies such as the Walking and Cycling network in TH23 Achieving Modal Shift.
- It was suggested that there is the potential for this lane to be used by public transport
- The Lane needs to have tree/hedgerow/open space to act as buffers.
- Learn from Green Lane where developers encroached into that lane.

#### Response and way forward:

Joe Blunt's Lane is a historic demarcation/boundary. Its integrity as a part of the history of the town and as a green corridor for wildlife and non motorised users needs to be maintained. However the reader needs to be aware of proposals for part of its use as access under the railway for buses.

Some of the background information provided will inform the policy.

Some changes to the wording of the policy have been made to strengthen it such as preventing encroachment and maintaining the rural nature of the Lane.

This is a key route for walking and cycling and will serve many functions. The route needs to be protected and improved. Any inappropriate changes to the route would result in great public opposition and affect users. More detail on proposals for use of the railway underpass for buses has been provided. The policy has been changed to potentially allow a guided bus route during the school term for the school run only.

The proposed masterplan shows that for the most part, the land use of the north side of the route will be formal and semi-natural parkland and Sustainable Drainage Systems (SuDS). The trees and hedges along its route will be protected by TH2 - locally distinctive features of the landscape.

### **37. TH30 – The Thetford Loops**

#### Summary of comments:

- Habitats Regulation Assessment (HRA) recommendations should be taken on board such as the ways of potentially resolving any urban effects that could result from improved access by visitors to sensitive areas of the Forest.
- Support for the policy.
- Include other areas around Thetford.
- The initial HRA notes four SSSI components of the SPA where adverse effects from increased housing and the Thetford Loops cannot be ruled out
- It is not clear how the Loops will be delivered.
- Utility cycling elements should have first priority for delivery
- Elveden Farms concerned about Loops on or near their land as promoting access would conflict with current land uses.

#### Response and way forward:

Within the existing town, the Loops will be provided through improvements and enhancements to the Walking and Cycling network. The relevant parts of this network that make up the Loops will be signed and branded accordingly, but serve a utility trip purpose in the main. As such, the Loops plan now includes the Walking and Cycling Network and highlights routes which are also the Loops.

To avoid concern and confusion, The plan includes 'implementable now' and 'priority' routes with an explanation of what this means. Category 'non priority have been removed'.

The cycling network within the Urban Extension and the Thetford Enterprise Park will be provided as part of that development as per relevant policies. The cycling network as it goes through the Town Centre will be provided as part of the delivery of the Masterplan.

Detailed guidance has been removed, although high level guidance remains and has been added to. Evidence in the technical report remains available and is on the MTF and BDC website.

The policy has been changed to emphasise that further detailed work will be needed prior to implementation and that this work will need to consider the opportunities that will be available for activities such as dog walking in the area and the extent to which the Loops map increase access to sensitive areas – for example routes in the Forest could change to reflect the felling cycle not only for safety of users but also to reflect that some bird species use areas of the Forest at different stages of growth to nest and fledge.

The suggestions regarding extra destinations for the Loops are valid and could be included in the Loops, although would need to be considered as part of the detailed planning and implementation, rather than in the policy, although the policy indicates that such changes could be acceptable.

### **38. Projects**

Summary of comments:

- Section is muddled by including these projects.
- Agreement and support for projects

Response and way forward:

Re formatting and extra text should mean this section is clearer.

### **39. TH31 – Indoor Sports Facilities**

Summary of comments:

- Existing sports centre under used due to high costs
- Swimming Pool at Charles Burrell should be retained.
- Weak policy as the wording is woolly and non specific..
- Uncertain if Urban Extension is the causal factor of the need for expanded facilities.
- Sport England commented saying that the wording is vague and also limited typologies mentioned.
- There is a need for sports provision to the south of the town.
- Perception that Thetford's provision of sports facilities is poor when compared to neighbours.
- Where would this go?

Response and way forward:

The Council acknowledges that this policy requires improvement.

The indoor sports facilities on offer in Thetford are provided through a PFI with Parkwood Leisure. As such, a meeting will be held between BDC and Parkwood Leisure to take on board comments made on this policy and determine a way forward for indoor sport provision in Thetford.

The requirements as set out in the policy are as a result of the increased population arising from the Urban Extension proposals. The requirements are based on evidence from the Infrastructure Study (EDAW 2009). It is acknowledged that further work is required regarding typologies using the Sport England methodology. This work would enhance the document. Should BDC submit the document without such evidence they must accept that the document could be found unsound or the policy deleted/amended by the Inspector.

Meeting to be held with Parkwood Leisure and BDC in coming weeks.

NCC and the Academy are aware of the public desire to retain the swimming pool at the former Charles Burrell school. As the detail of the Academy proposals is currently uncertain there is insufficient evidence to specifically safeguard the site or demonstrate that the facility will be available for public use.

Thetford benefits from a well equipped leisure centre with a diverse range of sports activities. There are also numerous outdoor recreational spaces. It is an aspiration to have a full range of high quality facilities within local area and BDC actively look for opportunities to improve facilities whilst balancing the budgetary restraints. BDC works with County and town councils and other partners to ensure that we encourage people to adopt healthy lifestyles. An example of this is the development of a skatepark on the Breckland Leisure Centre site. Land has been supplied by Breckland, Moving Thetford Forward has provided the budget for the build and Thetford Town Council has agreed to take ownership and management responsibility for the facility upon completion. Leisure facilities such as bowling centres and cinemas tend to be privately run and are provided when there is a sustainably viable business proposition with appropriate demand. Such opportunities may arise as Thetford grows and the population increases. Breckland Council has a key role to play to make Thetford an attractive proposition for leisure operators.

### **40. Play equipment**

Summary of comment:

- Concern that this is a vague promise

This has now been moved to the existing residential estate section in the area intervention chapter.

The accompanying commitments paper also highlights this project to the relevant councils.

### **41. TH32 – Energy and Carbon – TAAP Wide.**

Summary of comments:

- Need for policy questioned.
- Potential to combine with other energy policies.
- Some agreement.

Response and way forward

Policy is still in the TAAP. The whole approach to energy in the TAAP has been reviewed. The requirement to demonstrate how proposals meet Government timetable have been removed. A section emphasising the importance of Fabric Energy Efficiency Standards added.

**42. TH33 – Energy Service Company Development (ESCO)**

Summary of comments:

- Any ESCO/MUSCO to be sited within settlement boundary and in appropriate place.
- Potential to combine with other energy policies.
- Some comments referred to CHP proposal on Mundford Road.

Response and way forward

Proposed biomass power station is a separate issue that is subject to the usual planning application procedure.

The section will be improved and expanded to give more detail. Text regarding an ESCO/MUSCO's potential role in assisting with carbon reduction has also been added.

Any proposal will need to go through planning application process and there are strict environmental standards and some constraints that govern the type and location of facilities. There are National and Core Strategy Policies that also guide such development.

**43. TH34 – Water and Drainage**

Summary of comments:

- HRA recommendations to be taken into account.
- Concern re smell of sewage treatment works.
- Potential to be combined with other water policies.
- Queried if water studies completed.

Response and way forward

Environmental performance of sewage treatment works are monitored by the Environment Agency. Comment also passed to BDC Environmental Health Team.

Water cycle studies have been completed. Please go to the LDF pages of [www.breckland.gov.uk](http://www.breckland.gov.uk). Anglia Water Services and Environment Agency involved in steering such studies and providing the technical data to inform them.

HRA recommendations will be taken into account in the wording of the Submission Version of the TAAP.

**44. TH35 – Development in Flood Zones**

Summary of comment:

- General support for this policy.

Response and way forward

Support noted.

It should be noted that no Representation on the Draft Final TAAP was received from the Environment Agency. The Environment Agency have since been contacted with the relevant sections of the TAAP as a matter of courtesy.

**45. TH36 – Area of Main Archaeological Interest and TH37 – Investigation Required in Other Locations of Archaeological Interest**

Summary of comments:

- Concerned that the TAAP does not provide a consistent context for the cultural heritage resource of Thetford.
- Support

Response and way forward

The heritage assets in the town are being investigated/improved in a variety of ways, not just through the TAAP:

- Gallows Hill is in an area of significant change and has dual issues of biodiversity and archaeology and as such has its own policy.
- The Existing Buildings in the Urban Extension are to be retained as undesignated heritage assets of local historic interest.

- There is a policy approach to bringing the Listed Buildings at the Railway Station into re-use.
- SMs are taken into consideration in the TAAP as a constraint/something to take account of in some areas (e.g. Bury Rd/Brandon Rd junction and approach to the Bridge street car park site).
- TH36 reflects specific evidence provided by NCC Environmental Services.
- Some listed buildings are being looked at through other channels, for example the Cosy Carpets Building will be improved through the Bus Interchange work and work has been completed to structurally secure St Mary the Less. Moving Thetford Forward has allocated funding for a grant scheme for buildings in the town centre.
- The town centre masterplan would have to take into account the conservation area and English Heritage and the Historic Buildings Officer are likely to be involved in its production.

The TAAP is in line with PPS5 and is informed by extensive evidence base and has involved Breckland's Historic Buildings Officer, English Heritage and Norfolk County Council.

Relevant comments relating to heritage assets have been forwarded to internal and external officers to gauge their thoughts on the approach to heritage assets in the TAAP and other ongoing work.

These two policies have been combined as they flow from one to the other.

#### **46. TH38 – Sustainable Construction Standards for Non-Residential Development**

Summary of comments:

- Potential to be combined with other policies.
- Support.

Response and way forward:

BREEAM standards are about more than just energy and carbon but also water and ecology for example. As such, this policy will remain separate and the Inspector will determine the added benefit of the policy.

The policy will change slightly to reflect further research into the issues addressed to add greater clarity in the policy and supporting text.

## **Comments on Area Interventions Policies**

#### **47. TH39 – Redevelopment Proposals in Existing residential Estates**

Summary of comments:

- Support.
- Lack of detail of what is specifically is planned for the estates.
- Consider the small shopping parades.
- Concern about precise proposals and the effect of infilling and the effect some potential changes could have on the existing residents.
- Potential to include reference to modal shift in this policy
- Pine Close shops need improving.
- Some specific current maintenance issues stated.

Response and way forward:

Reference to the existing small shopping parades will be made as well as reference to modal shift.

There is a scale of interventions from minor aesthetics to schemes involving 10's of dwellings. The capacity for further development within the built up area of Thetford is relatively limited however the Council needs to be mindful that small to medium scale sites do come forward from time to time. Additionally, Flagship Housing have embarked on a programme of investment in the existing estates and this has resulted in a number of schemes ranging from sites of 3 houses on former garage sites through to more comprehensive redevelopments of 60+ homes. The Policy does not seek to give specific detail of schemes; rather guide such schemes in recognition that further development is likely. Core Strategy DC1 on Amenity and DC16 on design would be of relevance to future plans.

The Council are keen to ensure that the TAAP addresses the whole town. This particular policy is about the existing estates around the town. Residents have been involved regarding the production of strategic plans for the estates. Sweyn Close work is ongoing and the plans have planning permission.

#### **48. TH40 – Existing Employment Areas**

Summary of comments:

- Employment areas might benefit from some ancillary services such as café.
- Support.

- Concern re language and jargon used – many did not understand what the policy proposes.
- Suggestion to add criteria to address energy and waste.

Response and way forward:

The policy will be refreshed to make it clearer what is intended and to take on board some of the suggestions. Some changes have been made to reflect the Plan For Growth document published alongside the 2011 Budget by HM Treasury for example employment areas could benefit from the Neighbourhood Plan or Neighbourhood Order approach. The Policy reflects such potential changes by using the term 'local planning initiatives' to give a more flexible approach.

## Comments on Delivery and Monitoring Sections

### 49. Section 30 - Delivery Section

Summary of comments:

- It is certainly true the TAAP must be supported by sound delivery mechanisms and measures to ensure a successful outcome. It needs to be clear therefore who is to take on this role MTF or BDC. Concern re economic climate not favourable to delivery
- Comments regarding where the funding for all these proposals will come from.
- Suggestion that this section needs to refer to PPA
- Include landowners and Keystone as delivery partners.
- Suggestion that there is potential for developer contributions to meet HRA requirements.
- Some suggested minor text changes
- Query re some of the costs quoted in this section and if they are correct.
- The AAP should be amended to enable developer contributions to be spent on projects wherever there is a demonstrated adverse impact on existing infrastructure that is directly attributable to the growth in the Area Action Plan, whether or not it is in the area covered by the Plan.

Response and way forward:

Paragraph 30.4 sets out the delivery partners and agencies. Moving Thetford Forward is primarily responsible for delivering and administering Growth Point funding. It is envisaged that over the period of the Area Action Plan, MTF will evolve as a delivery body as and when Growth Point funding runs out. The Monitoring and Implementation Framework assigns delivery responsibility and Breckland Council is appropriately included in this Framework. It is recognised that as we go forward the Monitoring and Implementation Framework needs to be updated and refined to provide clarity on who is responsible for delivery.

Despite contracting public finances, Local Authorities and public agencies maintain statutory responsibilities to deliver and support new development in the wider public interest of providing jobs and homes. There remain sources of external funding from both European and national funding sources including the Growth Point funding awarded to Thetford. Critically, the majority of infrastructure delivery and investment will come from developers either directly as a result of conditions on the planning permission or indirectly in form of financial contributions. National policy allows for a levy to be raised on new development to contribute towards infrastructure cost. The levy is effectively funded from the uplift in land and property values and developers are aware of this levy requirement and factoring it into their development appraisals. The infrastructure costs for Thetford are provided within the Breckland Infrastructure Study (2009) with elements updated through specific studies such as the A11 Energy Study (2010; Breckland Water Cycle Study (2010); Thetford Transport Study (2010) and the Breckland Integrated Delivery Document (2011). All of these documents are available to view on-line as part of the supporting evidence base for the TAAP.

Funding could come from Tax Increment Financing, New Homes Bonus, Community Infrastructure Levy, Developer contributions, regional growth fund which are being finalised at Government level. Development itself will be privately funded and make significant contribution to wider infrastructure in Thetford.

Breckland Council recognises that evidence indicates that development and increased population will have an effect on existing habitats with public access, notably heathland areas which can be attractive for dog-walking, recreation and use as local greenspace for play. The issue is one of managing public access and deflecting pressure on these valuable resources. This will require a review of how such sites are managed as well as requiring development to provide and contribute to local greenspace areas which can reduce pressure by providing attractive alternative areas for dog walking and play/recreation. To address this issue it is recommended that a specific policy on biodiversity is introduced into the TAAP to encourage a review of management plans and to set out the parameters of developer contributions (through either S106 or successive CIL documents) towards monitoring and mitigation measures. In respect of the Urban Extension, the issue will be considered as part of the PPA process where developer contributions to a variety of requirements are being looked at in more detail. Biodiversity and monitoring/managing urban effects on European Habitats is part of the application discussions.

Breckland Council has recently completed an Infrastructure project prioritisation process through a document known as the Breckland Integrated Delivery Document (BIDD). This process meets the requirements of the HCA and EEDA and identifies those projects critical to the successful and sustainable delivery of the growth and regeneration agenda. A specific package of projects was assessed for Thetford as part of this process. The BIDD was referential to the existing Breckland Infrastructure Study (2009) which identified infrastructure as being critical, essential or desirable. There has to be a realism that development is unlikely to fund everything and this will require two steps to be taken (as already identified in the TAAP at paragraph 30.9). Firstly, it requires agreement/understanding of what is critical and essential infrastructure in a Thetford context and negotiating these with developers. The key infrastructure necessary to make the development happen (transport, water, energy) is non-negotiable but there will be many policy requirements of the Council and local priorities that will need to be negotiated. The second step is to identify those mechanism which will deliver desirable and additional infrastructure. The TAAP identifies Tax Incremental Financing and Local Asset Backed Vehicles as two examples from the Government's Local Growth White Paper (2010) which could be used by the public sector to bridge infrastructure funding gaps. It would be inappropriate for the TAAP to provide detail on which mechanisms and how they will be implemented but it can provide the outline of alternative funding sources to developer contributions.

Revisions to costs will be addressed as part of finalising the Infrastructure Delivery Programme to which the Highways Agency will be a consultee. This will ensure estimated transport costs are as realistic as possible at the time of Plan submission. Breckland Council recognises that base transport costs have been explored and refined as part of the Thetford Transport Study (2010) however there is a need to undertake further work in advance of submitting the document.

Core Policies 4 and 5 of the adopted Core Strategy set out the policy framework for delivering strategic infrastructure and developer obligations. As the Core Strategy applies to Thetford it seems unnecessary to repeat adopted policy in another DPD. However, Breckland Council is keen to work with the County Council on the Infrastructure Delivery Programme for the TAAP and ensuring that the best potential for CIL is reflected in the document.

PPA will be referred to and extra delivery partners will be added.

S106 will be used for issues directly related or relevant to the proposals. Some identified infrastructure will be provided where there is evidence. CIL could also be used but focus is on the immediate impact for the host communities as this is where the relationship is greatest. The wider impacts/effects of growth were tested through the Regional Spatial Strategy (RSS) process.

## **50. Section 31 - Monitoring and Implementation Framework**

Summary of comments:

- A strategy could include the commitment to undertake and make use of a Conservation Area Appraisal and Management Plan, and consider the introduction of Article 4 Directions to limit permitted development rights within the conservation area and avoid harmful incremental changes. Also a review of the Conservation Area Boundary.
- As an observation, we note that the Policy references do not match the main text, and there is a sub-heading which infers that all of the policy indicators relate to the SUE. We presume this is not intended to be the case..
- Quantified measures needed rather than 'maximise' or 'minimise'
- Extra indicators suggested in relation to include Norfolk Landscape Archaeology (i.e. planning permissions granted contrary to NLA advice).

Response and way forward

The heritage assets in the town are being investigated/improved in a variety of ways, not just through the TAAP:

- Gallows Hill is in an area of significant change and has dual issues of biodiversity and archaeology and as such has its own policy.
- The Existing Buildings in the Urban Extension are to be retained as undesignated heritage assets of local historic interest.
- There is a policy approach to bringing the Listed Buildings at the Railway Station into re-use.
- SMs are taken into consideration in the TAAP as a constraint/something to take account of in some areas (e.g. Bury Rd/Brandon Rd junction and approach to the Bridge street car park site).
- TH36 reflects specific evidence provided by NCC Environmental Services.
- Some listed buildings are being looked at through other channels, for example the Cosy Carpets Building will be improved through the Bus Interchange work and work has been completed to structurally secure St Mary the Less. Moving Thetford Forward has allocated funding.
- The town centre masterplan would have to take into account the conservation area and English Heritage and the Historic Buildings Officer are likely to be involved in its production.

There will be some areas where baseline information will not be as comprehensive as wished for due to absence of monitoring or lack of data at the Ward or Parish level. As such, could be occasions where a trend is set rather than a

specific target. The table has been refreshed and improved taking on board comments made on the Draft Final TAAP.

### 51. Other changes

The following changes have been made to the TAAP as a result of internal discussions and also in response to information provided as part of the consultation.

- Biodiversity Policy - a new policy on Management Plans for key sites has been produced to reflect the initial Habitats Regulation Assessment findings.
- Proposals maps have been changed to improve usability and to reflect changes in the policies. As well as the main proposals map and the town centre inset, there is now an environment and landscape map and a transport map.
- General improvements to text in some places to reflect typos or poor grammar or to aid interpretation and give clarity.
- Surface water management has been mentioned in the Existing Employment Estate section and the Existing Residential Estate policy.
- Marmot Review has been included in the TAAP and Healthy Town Appendix.
- Greater emphasis on how to use the TAAP document has been included, for example in relation to policies that are TAAP wide equally apply to the Urban Extension.
- The order of the document has been changed to reflect that the TAAP must have emphasis on the existing town.
- The Impact of change on pedestrians, cyclists and buses policy has been simplified and made to be more to the point as it was felt internally the policy was needlessly too long.
- The Railway Station policy has been changed slightly to reflect the potential different requirements for different railway buildings – the warehouse for example could be suitable for offices or houses.
- Rather than the term 'all development' or the like, policies now say 'All net new development excluding minor householder applications'.
- A new policy has been introduced regarding the changes to the Settlement Boundary as shown on the Proposals Maps.

## Comments Habitats Regulation Assessment

Summary of comments:

- 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: 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. 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
- Concern re the proximity of the works at the A11/A134 and A11/A1075 junctions to the Breckland SPA and SAC. Further assessment is necessary.
- Policy TH30 has the potential to increase disturbance levels within the Breckland Special Protection Area (SPA).
- Urban Effects: 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.
- Re water abstraction: text along the lines of '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' should be included.
- 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.

Response and way forward:

- The Thetford Loops policy has been refreshed in light of the comments received. The issue of the routes directing people to sensitive locations has been addressed through including measures such as signing, wardens and temporary routes in the text.
- The impact of changes to the A11 is a significant issue where mitigation will be required. The potential impact has been addressed in the relevant policy and enables the document to pass its Appropriate Assessment

- A Bird Access and Monitoring Framework has been inserted in the Monitoring and Implementation Framework section to address potential effects arising from recreational impact in Thetford Forest.
- The comment regarding the Wash has been passed to the consultants who will be undertaking the Submission TAAP HRA for consideration.
- A new policy in Biodiversity Management has been included in the TAAP.
- New text about water abstraction has been added to the relevant policy, similar to the suggestion.

## Comments on Sustainability Appraisal

### Summary of comments:

- NLA should be updated to Historic Environment Service.
- There are two areas where 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.

### Response and way forward:

- Name change noted.
- Suggestions regarding assessing biodiversity have been taken on board.

## Next Steps

The above changes will be made to the proposed Submission version of the TAAP.

Over the Summer, the TAAP will be taken to Breckland Council Cabinet and Full Council and further changes may ensue.

It is proposed that the statutory 6 week publication prior to submission of the document and examination in public by an independent Planning Inspector be undertaken from the middle of August. This could then see submission in October and examination just before or just after Christmas.

Of course the above process depends on the representations received during the 6 week statutory consultation period and any soundness issues identified.