



THETFORD TOWN COUNCIL

11th October 2024

Planning Department
Breckland District Council
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE
For the attention of Mr Simon Wood

RE: Application Ref: 3PL/2024/0394/O

Proposal: Outline planning permission for demolition and phased development of residential units (up to 500 units uplift) including special care units and HMOs (Classes C3, C2 and C4) and up to 1,600 sq. metres of flexible floorspace for purposes within Class E (commercial, business and service), Class F1 (Learning and non-residential institutions), Class F2 (Local Community) and sui generis uses (laundrette and hot food takeaways); external alterations to existing properties; together with associated highway, engineering and landscape works. All detailed matters except access points at boundary approved for future determination.

Site Address: Abbey Estate, Thetford, Norfolk, IP24 1EE

1. Introduction

Thetford Town Council (the Town Council) is writing in response to the proposal submitted by Flagship Housing. The Town Council notes this is seeking in principle agreement to an extensive redevelopment of the Abbey Estate, which if approved could result in the demolition of more than half the existing homes on the estate and almost all of the garages, construction of over 1,000 new homes over a 20-year period and the loss of nearly half the existing public open space on the estate and an unspecified number of mature trees. The remaining properties on the estate in the ownership of the applicant may be subject to a maintenance and refurbishment programme.

The Town Council notes the supporting documents submitted by the applicant outlining their engagement of the residents of the Abbey Estate.

The estate currently has 1087 dwellings, of which 886 are houses, 143 are flats/maisonettes and 58 are bungalows. It contains 771 garages, 427 integral to existing homes and 294 en bloc. The application proposes the demolition of up to 556 existing homes and up to 726 garages, including those which are within the curtilage of existing houses.

The Carnegie, Cage Lane, Thetford, Norfolk, IP24 2DS

Tel: 01842 754247

mail@thetfordtowncouncil.gov.uk • www.thetfordtowncouncil.gov.uk

It proposes the development of up to 500 additional dwellings, resulting in a 46% increase in the number of homes on the site, and a more than 30% increase in density from 30 to 40+ properties per hectare.

There are currently some 3000 people who live on the estate, more than 10% of the population of Thetford. The proposed increase in homes would increase the population on the estate by around another 1000 people according to the estimates given by some of the statutory consultees, which will inevitably lead to further demands on health, education and social infrastructure as well as traffic congestion, and no proposals to mitigate this within the application. For example, the Bishops School on the estate is full and complains about being regularly oversubscribed. There are also no NHS dental appointments available in the town for residents.

The development will be undertaken in 9-10 phases over a period of up to 20 years.

The application form itself states that the proposal does not include the 'gain, loss or change of use of residential units' which is clearly incorrect.

This proposal would considerably change the character of the area, displace an established community, and is a significant departure from open space policy.

The Town Council notes with concern in particular the comments of the Environment Agency, Health & Safety Executive and Anglia Water about the flood and health and safety risks associated with the Application. The Town Council notes that while the HSE has revised its comments and removed its objection on safety grounds to the proposed increase in housing density from 30 to 40+ dwellings per hectare on a substantial part of the proposed site, it nevertheless indicates significant concerns with the scale of the proposed development on what is a technically difficult site. It also notes the holding objection submitted by Norfolk Wildlife Trust because of the absence of a satisfactory biodiversity assessment.

This application has attracted a considerable number of local comments, the overwhelming majority of which object to the proposals in full or in part.

The Town Council agrees there is a need for more housing in Thetford but considers this proposal will substantially change the character not only of the estate, but the whole town, atomise a large, established community and have long-term environmental consequences. As presently worded, it is unlikely the proposal will help address housing need since at present only 25% of the new homes are proposed to be 'affordable', specified as 'affordable rent' or shared ownership with no suggestion of any being for social rent, at this stage. The Town Council notes the poor demand for shared ownership and the ongoing need and demand for social rented homes set out in Breckland District Council's new Housing Strategy.

You will see that we have set out our observations below:

2. Technical / Specialist Comments

Within this section of the letter we set out the following observations relating to specialist or technical matters, as follows:

Secure by Design

It is noted that the Secure By Design (SBD) officer has made various comments, some of which are supportive and some of which suggest that further work is required in order to achieve a design which would be safe and help to reduce crime. There appears to have been no attempt to engage the SBD Officer in identifying work that could mitigate or eradicate the current security concerns without undertaking the demolition and reconstruction of the estate. We consider this option should be assessed as one which will have the least detrimental impact on existing residents and may well resolve most of their concerns about security and anti-social behaviour.

In conclusion, the Town Council considers that all of the concerns about safety and crime could be addressed in partnership with the police without the large scale demolition proposed.

Ecology:

There is an ecological holding objection from Norfolk Wildlife Trust stating: a) insufficient ecological information on designated sites (Abbey Meadows County Wildlife Site), b) European Protected Species (Bats) and c) insufficient information on Mandatory Biodiversity Net Gain. Only a small amount of sample buildings have been surveyed which we believe is an unacceptable approach due to the fact that an outline application would approve the development in principle for the description and the red line area. We are also aware that residents have erected bat boxes due to the presence of bats and nature in the area, these would be required to be surveyed as well.

If bats are found to be roosting within any of the buildings or boxes it would be necessary for the work to be undertaken under a European Protected Species or Bat Mitigation Licence. Based on the information provided it would not be possible to reach reasonable conclusions and would suggest that all buildings and bat boxes need to be surveyed. This approach is re-inforced by paragraph 99 of the ODPM Circular 06/2005, which highlights that:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.”

A compliant Biodiversity Net Gain assessment has not been provided with this application despite this now being a requirement for all major applications.

Flood Risk Considerations:

As the site area exceeds 1 hectare there is an essential requirement for a flood risk assessment, even when sites are entirely located in Flood Zones 1.

Whilst it is stated that the site falls within Flood Zone 1, part of it is located within and/or adjacent to zones 2 & 3. The Environment Agency has objected to the Application because of the absence of an 'acceptable' flood risk assessment, specifically citing the lack of an assessment of fluvial flood risk. Likewise, Anglia Water highlights the risk of surface water (pluvial) flooding, and concerns about the adequacy of sewage management to handle an additional 500 homes. Anglian Water further advises that their pre-application advice is now out of date and also that some dwellings could be at risk from odour emissions and noise emanating from their sewage works. Paragraphs 167 & 168 of the National Planning Policy Framework states the requirement to undertake a Sequential Test of the risk of flooding from 'any source'. This has been previously interpreted by the Planning Department to mean that a sequential test and subsequent exception test would be required. Paragraph 168 of the NPPF states that:

(Para 168. Of the NPPF) "The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding".

In addition to this above point, Breckland Council Planning Department has made it clear on various recent cases that if one part of the site is within an area at risk of flooding, the requirement for a sequential test would apply to the whole site. The Council has also asserted that the scope of the sequential test search area would be the entire District.

In conclusion on this matter, if a sequential flood risk assessment is undertaken it is our opinion the application would almost certainly fail.

Air Quality Considerations:

We note the comments of the Air Quality Officer in respect of the Air Quality Assessment which is deemed insufficient for the purposes of the scale of the application.

As such it is not possible in our opinion to draw meaningful or accurate conclusions on this matter, but incorporate our views based upon the data available in our comments on the Health Impact Assessment below.

Highways:

The Highways Authority has not yet responded to this application. We would comment that the suggested parking provision of 1.52 car parking spaces per dwelling (plus an additional 64 visitor parking spaces) would be well below the likely demands for car parking based on the Norfolk County Council parking standards. The site layout and design, suggests the development is quite 'tight' and urbanised in terms of its design approach and appearance, indicating that this would be an over-development of the site. There is a limited bus service with limited operating hours on the estate and residents' need for private vehicles reflects the reality of poor public transport connectivity with major employment and education centres. The proposal also ignores the reality of inter-generational households as adult children live with their parents for longer so increasing demand for parking spaces. The estate is characterised by a high density of families, which is unlikely to reduce with the development, notwithstanding proposals for older persons and supported living schemes.

Many of the representations received by the Town Council are in opposition to the loss of garages and parking spaces integral to the properties, with concerns about a parking 'free for all' if the proposals are agreed. The Health Impact Assessment refers to 'illegal' parking on the estate. While it is accepted that parking on verges is an issue – this is not 'illegal' and the area currently has no controlled parking zones. It is difficult to see how parking disputes between residents will be avoided if designated parking spaces are lost. The Town Council notes that while the integral garages may not meet current space requirements for car parking, they nevertheless provide essential storage and activity space for residents who have them and their loss will cause significant detriment to those households.

The proposals for car parking have generated some of the most critical comments from residents who live with the issue and are best placed to understand how these proposals will affect them and any future residents on the estate. Since the demolition of almost all the garages on the estate are integral to the development proposals, we consider the application should not be approved given the detrimental impact to existing and future residents on the estate.

It is noted that at the time of writing NCC Highways have not yet submitted their formal comments on this application. Thetford Town Council reserves the right to respond further once these comments are received in the public domain.

Open Space:

The Breckland Council adopted Local Plan 2019 is still current and therefore Policy ENV 04 - Open Space, Sport & Recreation applies to this application. This policy specifically references the Breckland Council Open Space Assessment 2015 which highlighted a 34.5ha deficit of open space in Thetford. Since that time the population of the town has increased but the open space provision has not, relative to the population growth. It is therefore highly likely that the deficit figure of 34.5ha has increased in the intervening years. With this in mind, Thetford Town Council is very concerned to note that this application, if allowed to proceed, will see a reduction of 5.3ha of open space from within the curtilage of the Abbey Estate.

In their document titled, 'Health Impact Assessment (inc. Open Space Assessment) April 2024', the applicant states that there is already a significant deficit of 7.78ha of open space on the site (Table A2. Page 52 refers). However, the figure provided in the table for the total population based requirement has been incorrectly stated at 19.88ha. When adding up all of the values in that column it actually gives a total of 23.82ha as the true population based requirement. The result of this is that the accurate onsite deficiency is currently 11.72ha.

When taking into account the increase in population from approximately 3000 to 4000 and a reduction in the available open space provision within the estate of 5.3ha as a result of this proposal, the onsite deficit in open space provision is stark.

The onsite provision is reduced from the current 12.1ha to 6.8ha with the corresponding population based requirement increasing from 23.82ha to 29.0ha. The figures provided by the applicant in Table A2 are, we would suggest, deliberately misleading. The net result of this proposed development would see an onsite deficit of approximately 22.2ha

In an attempt to try and mitigate for this blatant land grab of available onsite open space, which has been cherished and available to residents for recreational purposes since the estate was first built, the applicant is seeking to use off site open space provision to justify this development. Thetford Town Council is very concerned to note this. These proposals will clearly significantly increase the housing density of the site to the detriment of the health and wellbeing of all residents. We would draw your attention to Table A3 of the aforementioned document. This too is inaccurate with the population based requirement incorrectly totalled as 19.88ha. The correct figure should be 23.82ha. As mentioned above, the actual figure, taking account of the resulting population increase is 29.0ha. The applicant is proposing to utilise 13.54ha of off site open space provision to try and justify this application. The total figure shown in Table A3 for 'Accessible Provision' is 25.64ha. Due to the reduction of 5.3ha caused by the increased development, the actual figure is 20.34ha. With a population based requirement of 29.0ha this still leaves the residents of the Abbey Estate with a deficiency of **8.66ha**

The Town Council strongly objects to the significant reduction in the on site open space provision which would result from these proposals. Residents value the open spaces currently available to them. Children are able to play and kick a football around close to their homes under the watchful eye of their parents. Residents should not be forced to walk or cycle off the estate to seek the use of open space, much of which is unsuitable for children to play ball games, is near open water and in relation to the woodland, this contains the very large Thetford Sewage Treatment Plant which does not make this an inviting destination. All of these off site locations already exist and residents can access them already if they wish. It should also be noted that all of the off site open space located to the south of the site sits within Flood Zone 3(flood plain) and will therefore not always be available to be used as practical open space for use by children and families.

Thetford Town Council is of the view that this proposed development will result in loss of amenity, not conform to the requirements of Local Plan Policy ENV 04 and is a significant material consideration for this outline application. We are disappointed to note that Breckland Council has already indicated its willingness to dispose of this cherished public open space to Flagship Housing through the signing of the memorandum of understanding, This commits the Council to dispose of the land at nil cost which will provide the Council with no funds for alternative provision

Comments on the Statements of Community Involvement Parts 1 & 2:

The Town Council notes that ‘conversations’ with residents began in 2019 and that the Applicant describes a ‘fair, transparent, cohesive’ approach to engaging and consulting with the community, claiming to have offered 75 opportunities for residents to submit their comments on the proposals, citing ‘events, 1-2-1 conversations, digital polls and surveys’. They state they have kept people updated with ‘brochures, letters...website and Facebook page’ and that their consultation has been ‘meaningful’. The Town Council is concerned at the lack of effort to make any consultation accessible given that a number of residents have English as a second language and there are some poor literacy rates amongst some sections of the community. We can find no evidence of meaningful engagement with migrant workers.

Having studied these documents the Town Council is concerned that they present a misleading picture of both the scale and outcomes of the consultations they have undertaken, and which do not reflect the feedback the Town Council has received from numerous residents of all tenures. It also notes that the applicant has not specified the number of residents who are not its tenants who have engaged with their various consultation exercises, nor, given the online surveys were not restricted to residents on the estate, how many non-residents’ views were taken into account in their conclusions. The Town Council would like to know how exactly the applicant has engaged with those residents who have no access or ability to use digital devices/broadband in order to ensure that the number of consultation responses and formal objections have not been suppressed. The responses to the Application from residents indicates a large number were not aware of the proposals in advance of the application being submitted, and those that were report inconsistencies and inaccuracies in the information they were given during the consultation period when compared with the details in the Application.

Specifically, the Town Council considers, having studied the written material distributed to residents, that the consultation on the scale of the proposed redevelopment was deliberately misleading. The first document that mentions the possibility of demolishing ‘up to 540’ homes is the brochure for the ‘Abbey Exhibition’ dated November 2022, in a text bubble at the top of page 7. Hitherto, all of the documentation focussed on improved open space, improved parking (without mentioning the demolition of almost all the garages on site), improved lighting, ‘some new homes’ and so on.

In 2019 Flagship’s initial consultation was with their own tenants. They state that ‘over 600 homes’ are in their management and that 550 people were consulted via text with 447 (81%) responding. The responses to the questions about satisfaction with their homes, the Abbey Estate and Thetford were represented in pie charts which showed an overwhelming majority felt ‘positive’ or ‘very positive’ about their homes, the estate and Thetford, with no more than 20% being ‘negative’ or ‘very negative’. The narrative in the statement states the results ‘demonstrated a need, aspiration and scope for improvement’. This ‘consultation’ failed to capture any reasons why people may have felt ‘negative’ or ‘very negative’ about their homes, the estate, or Thetford.

After this the Applicant extended their consultation to the rest of the estate and held 7 drop-in sessions on the estate – the last of which was the ‘best attended’ by ‘around 100’ people. The application does not specify the number of owner-occupiers and private tenants who were directly contacted, although does state it was unable to identify all residents who were not its tenants. The majority of all drop-in sessions were mid-week, during the day, with only one held on a Saturday and only two extending to 8pm – thus excluding the majority of working residents.

In 2020 there was an online poll which engaged 89 people.

Between September 2020 and January 2021 404 people took part in a 'hybrid survey' – which identified concerns about a lack of play equipment for children, flytipping, safety and security and the condition of garages. What is meant by 'hybrid survey' is not explained, nor who took part, or whether they could be verified as residents on the Abbey Estate.

In June 2021 it is claimed 2095 surveys were completed and there were 'many more conversations' with residents. It is not clear precisely what information was given to residents about the plans, nor in what format. The applicant then presented the various 'options' for the estate over four stages, which engaged between 447 and 588 people on the estate. It does not detail how many were repeat participants, nor how many individual households were represented by this number. Based on the feedback it has received the Town Council suspects that the majority of people who participated in the consultation exercise were Flagship tenants, that very few, if any private tenants were directly involved and that owner occupiers and private landlords have had very limited engagement.

The document 'Our Promise and Support for Abbey Residents' produced after the 2021 consultation concluded with the production of the 'preferred' design was also misleading in terms of the size of replacement homes for people forced to move. On the one hand it talks about replacing homes on a 'like for like' basis, while also stating replacement homes will be of 'a suitable size to meet your needs'. From the feedback the Town Council has received it is clear the majority of Flagship tenants who will be displaced believed they would receive a 'like for like' alternative which is not Flagship's intention.

It appears that none of the options presented for consultation prior to the submission of the application were explicit that the proposals could result in the demolition of half the homes on the estate, the loss of almost all garages and half the public open space on the estate. It also appears that none of the options were explicit that in addition to demolishing half the homes, the remaining residents would be living in a building site for 20 years.

The Town Council also notes in the Statement of Youth Engagement, the high proportion of children who regularly play outdoors on the green spaces and their view that there need to be more facilities for young people on the estate, noting that play equipment was removed some time after the stock transfer.

The Town Council notes that of around 175 responses by local residents to the application thus far, almost all were opposed to the proposals, expressing dissatisfaction with the consultation process. Of the very few who were supportive of the proposal they gave disrepair as the reason – indicating that poor maintenance by the Applicant is the principal reason why a small number of people on the estate wish to move.

It further notes that repeated requests by the residents' group for a meeting of residents have been ignored. The Town Council considers that the consultation up to now is not accurately represented in the statements and that there is no widespread community support for this proposal. **On the contrary, the community is almost universally opposed. The Town Council also notes the objections to this application from councillors of all tiers of local government representing the Abbey Estate.**

There are up to 300 households on the estate who are private tenants who face homelessness as a result of this development, a proportion of which will no doubt confer a housing duty on Breckland District Council. It is difficult to reconcile Breckland's statutory duty to prevent homelessness with a proposal that will result in so many households losing their homes.

The Town Council also notes with concern that no new social rented homes are proposed in the application with the likelihood of a net loss of low-cost housing in an area of high housing need.

Comments on the Health Impact Assessment:

The HIA refers to the Applicant's vision to 'deliver high quality, safe and affordable homes across a range of tenures'.

The Town Council notes that the Abbey Estate currently provides high quality, safe and affordable homes to the vast majority of the 1087 households living there. 74% of homes are classified as being in 'good' condition, while only 5% are classified as 'poor'. The Town Council is aware that there has been a lack of investment on the estate with some homes owned by the Applicant and private landlords in a poor state of repair. The assessment offers no evidence for the assumption that the homes are 'potentially vulnerable to overheating in summer and cold in winter'. It acknowledges that issues with thermal comfort and efficiency can be fully mitigated with retrofitting those homes not slated for demolition – it therefore follows this could be an option for all homes on the estate, subject to owner-occupiers and private landlords choosing to invest in this way in their own properties. The Town Council notes that Breckland District Council is the enforcement agency on housing standards and has the power to require both the Applicant and private landlords to undertake necessary maintenance and retrofitting to address any Category 1 hazards identified in their properties.

The HIA refers to the estate having been developed in the '50's', when in fact it was built in the 1960s and 70s – to an award-winning standard, and lends itself to being upgraded through retrofitting and refurbishment at much lower cost and disruption to residents than the proposed demolition and redevelopment.

The HIA was a desktop exercise, drawing on data from the Local Study Area, roughly twice the size, number of dwellings and population as the Abbey Estate, which is estimated to have around 3,000 residents. Some data was provided on a borough-wide basis, and some on a County basis so the assessment can not be considered sufficiently specific to the proposed development on the Abbey Estate.

The desktop assessment shows that disease prevalence is at or below the national average for the majority of conditions, the exceptions being depression, obesity, cancer, COPD and chronic kidney disease. Of these cancer and obesity are significantly above the national average, while the others specified are marginally above the national average. Yet the summary at 6.2.16 refers to 'high levels' of hypertension, depression, diabetes, asthma 'particularly' within the LSA. The Town Council considers this is misleading, and in any event shows no connection between housing conditions and ill-health among the estate's residents.

The Assessment notes that in the LSA over 3,000 residents over the age of 18 suffer from depression, yet the impact of the Application on residents' mental health barely gets a mention and only in the context of mitigations. Appendix F question 5 dismisses the stress and anxiety of residents about the loss of their homes, garages and community, stating 'while there will be disruption to residents having to move home, the consultation process has sought to minimise stress and anxiety in relation to this and re-provided and retrofitted premises will improve the quality and quantity of housing stock serving Abbey Estate population and that of the wider housing market area'. The Town Council has received representations from hundreds of residents reporting anxiety, stress and depression caused by the uncertainty surrounding their homes and the likely duration of the disruption to their lives if this Application is approved. These are reflected in the high number of objections submitted by residents to this Application. Our concerns about the quality and extent of community engagement are detailed above.

The Town Council is concerned that the HIA comments in respect of open space are particularly misleading. The Application would result in the loss of more than 5 hectares of open space on the estate, despite evidence in the youth consultation that a far higher percentage of children regularly play out than the national average – primarily due to the amount of green space they can access close to their homes. The HIA seeks to include around 12 hectares of open space that are not on the estate, are at the maximum walking distance recommended by the Fields in Trust guidance – and which includes the sewage works - to mitigate the loss of open space on the estate.

The Town Council considers that open space outside the estate should not be considered an acceptable mitigation for the loss of open space on the estate itself, particularly given the poor quality and quantity of play, sport and recreational provision detailed in the HIA. The Town Council agrees that the open space could be improved and that LAPs and LEAPs should be provided, along with allotments. But this need not entail the demolition and displacement of half the estate.

The Town Council also notes the high population density on the estate, reflecting the fact that most of the properties are family accommodations. This is also reflected in the demographics which have a higher than average number of children and lower than average number of older people. The HIA indicates insufficient healthcare provision in the vicinity of the estate and does not propose the development of healthcare facilities on the estate, despite a potential 25% increase in the population if the Application is approved.

The impact of demolition, construction and removal of spoil will have a serious impact on air quality, on an estate where levels of asthma reflect the national average and COPD is higher than average, notwithstanding better than average air quality at the moment. The recommended mitigations will not be sufficient to eliminate the increased risks posed by the proposed development to the health of local residents.

The Town Council also considers the HIA understates the impact of noise and construction traffic on the health of residents, reminding that this development is scheduled to take 20 years to complete; that demolition and construction will be taking place adjacent to where people are living. The duration of the proposed development appears not to have been considered as a factor impacting the health of the residents. Paragraph 8.5 of the HIA claims that detriment to air quality, noise and neighbourhood amenity can be sufficiently mitigated as to make their impacts either neutral or positive, which are based on un-evidenced and incorrect assumptions in the HUDU matrix at question 18.

The Town Council further notes that construction accounts for 37% of global carbon emissions [‘Building Materials and the Climate: constructing a new future’; UNEP 2023], the cement industry alone counting for around 8% [CBS News 16/1/23]. It follows that this development, if approved, will negatively impact Breckland’s ability to achieve sufficient carbon reduction to meet its targets and address the climate emergency over the lifetime of this project, and considers that once a compliant air quality assessment is undertaken this will become obvious.

The Town Council further notes that there are no proposals to develop new homes at social rent, referring only to ‘at least’ 25% being ‘affordable’ and ‘intermediate’. The need in Thetford is for low-cost social rented housing to replace some of that lost under the Right to Buy. Affordable rents, at 80% of market rent are generally not affordable for people on low incomes.

3. Principle of Development and concluding comments

This is a highly complex case involving a large site with a high number of existing residents.

Breckland Council has a 5-year housing land supply and is working on a new Emerging Local Plan. In this context the Application appears to be speculative, is clearly against policy and therefore a significant departure from the development plan. The Town Council therefore considers that only the ‘straight’ planning balance would apply, which means that the benefits of the scheme need to outweigh its adverse impacts. As detailed above the Town Council considers the Application fails this test, and further is against the ‘principles of sustainable development’ as set out in paragraph 8 of the NPPF, which states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

The Planning Statement provided with this application does not include a planning balance or assessment against the principles of sustainable development that shows how the proposal’s benefits outweigh its adverse impacts, as required by Paragraph 11 of the NPPF.

Furthermore, the Town Council notes that Article 8 of the Human Rights Act 1998, which states "Everyone has the right to respect for his private and family life, his home and his correspondence", is a legitimate planning consideration. It also notes that for any Article 8 objection to be valid it must show that the detrimental effect of a development outweighs the wider public interest. It is considered that the scale of this proposed development will have a severely detrimental impact on 100% of the residents. Those who face the loss of their homes include owner-occupiers and private tenants as well as an unspecified number of Flagship tenants. In addition, hundreds face the loss of integral garages and off-street parking. Every resident who remains on the estate faces 20 years of disruption from construction work and associated traffic, along with reduced air quality.

Once this development is complete the living environment will be less pleasant with the loss of green space and a 30% increase in household density. The proposed 'up to' 500 new homes would see an average of just 25 additional homes per annum over the life of the development. As a result the Town Council considers the detriment to this established community outweighs the wider public interest of additional housing on the Abbey estate and as such an Article 8 challenge would be legitimate. The proposal is deficient in many respects and has drawn strong objections from several statutory consultees. Its scale would completely change the nature of the estate, resulting in a substantial increase in the density of homes and population and a large reduction in open public space – so failing to meet three of the overarching themes, namely 1,3 and 5 of Breckland Council's Design Guide, adopted in 2024. These are:-

- ***Theme 1: Guidance on complementing and enhancing local character through the thorough understanding of the local context.***
- ***Theme 3: Guidance on developing schemes which integrate with nature and the local landscape.***
- ***Theme 5: Guidance on creating distinctive character to respond sensitively to the local context.***

As an outline application it seeks agreement in principle to the proposed design, which if approved will green light a development that is not wanted and does little to address the housing needs of Thetford's community. It represents a clear departure from existing policy particularly in relation to open space. It will change the character and appearance of the local area and deliver an urbanising effect, to the overall detriment of the residents on the estate, and the town as a whole.

The Town Council believes this outline application should be rejected and the Applicant invited to produce a proposal that will avoid demolishing existing homes and loss of open space on the estate. Any new proposal should incorporate a comprehensive programme of retrofitting and refurbishing existing homes. Any in-fill proposals should complement and enhance the existing context, deliver better integration with nature, and enhance the current beauty and existing local identity of the estate by improving its open space and amenities. In particular the Town Council wants to see vacant properties on the estate – including flats above shops and long-term voids – brought back into use as low-cost housing for local residents.

In conclusion we do not believe that the proposal is acceptable in its current form, does not contribute to meeting local housing need and has not achieved the principles of sustainable development. Most importantly, the residents of the Abbey Estate, who's lives will be blighted by this proposed re-development for a generation, are almost universally opposed to it. Their health, wellbeing, happiness and peaceful enjoyment of their homes, should be of paramount importance to everyone concerned. The Town Council does not believe that the applicant, having submitted these proposals, shares this view.

The Town Council strongly opposes this application and reserves the right to comment further upon the receipt of additional comments from statutory agencies.

Yours Sincerely

Members of Thetford Town Council

Yours Sincerely

Members of Thetford Town Council

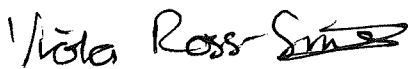
Councillor Terry Land



Councillor Terry Jermy



Councillor Dr Viola Ross-Smith



Councillor David Blackburn



Councillor Carla Barretto



Councillor Mac McDonald



Councillor Mike Brindle



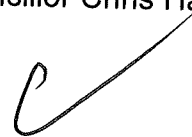
Councillor Matt Stirrup



Councillor Vic Peters



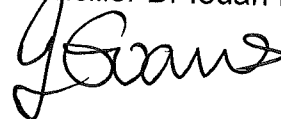
Councillor Chris Harvey



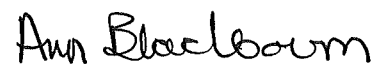
Councillor Adam Mitchell



Councillor Dr Ieuan Evans



Councillor Annie Blackburn



Councillor Ron Wood



Councillor Stuart Wright



Councillor Doug Jefferson



Councillor Stuart Terry

