

**Evidence Base
Final Submission**

Attleborough Neighbourhood Plan

February 2017

(Updated from July 2016)



Abbreviations used:

AHG	Attleborough Heritage Group
ANGSt	Accessible Natural Green Space Standard
ANP	Attleborough Neighbourhood Plan
ANPSG	Attleborough NP Steering Group
ATC	Attleborough Town Council
BC	Breckland Council
FIT	Fields in Trust
LGA	Local Government Association
NCC	Norfolk County Council
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SME	Small and Medium-sized Enterprises
SUE	Strategic Urban Extension

1. Introduction

1.1 The ANP evidence is based partly on evidence used for Breckland Council's *Adopted Core Strategy* (2009), also the evidence used for the abandoned *Attleborough and Snetterton Heath Area Action Plan*. The evidence now in place for the emerging *Breckland Local Plan* is also used.

1.2 This is combined with evidence that the Town Council Attleborough Steering Group (ANPSG) commissioned from consultants on Sports and Open Spaces, and Health and Social Care. In addition, to examine the current employment requirements and spaces available in the town, a short review of the available evidence and a brief qualitative survey of the current town centre were undertaken by consultants Core Connections Ltd. in March 2016, to compare the results with the town centre studies done earlier.

1.3 Reports of all these studies will be made available on the Town Council web site and at the Town Hall.

1.4 The Guidance on preparing Neighbourhood Plans states: "Whilst there are prescribed documents that must be submitted with a neighbourhood plan there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan." The succinct list of documents we have used is in the separate pdf entitled *Evidence Base Reference Documents*, available on the town council web site and in the Library and Town Hall.

"A local planning authority should share relevant evidence, including that gathered to support its own plan making, with a qualifying body

Neighbourhood plans are not obliged to contain policies addressing all types of development" Government Guidance on Preparing Neighbourhood Plans

1.5 In preparing the ANP we have sought evidence to support policies on two key matters: the need for proportionate and timely infrastructure to support the quantum of additional homes the Core Strategy and recent planning permissions given since the Core Strategy was approved, and the allocation of a suitable additional employment site on the London Road to avoid the town being simply a commuter location.

1.6 This Evidence Base document is organised under the same seven Themes as the policies of the ANP itself. However there is also considerable evidence in two other documents that is not necessarily repeated here: Section 2 of the ANP itself (entitled About Attleborough), and the SA/ SEA Draft Scoping Report and its appendices. A full Options Analysis discussion is given in this document.

1.7 To supplement the evidence supplied by BC and NCC, the ANPSG commissioned its own research. The key research undertaken was at the option analysis stage, so documents date from 2015, but is supplemented by two later studies: on the local economy: and a play audit.

- Health & Social Care
Report by Edward Hare and Jenny Manser (still confidential as it has site specific data and details of costs.)

- Sports and Recreation Provision
 - (Note there are inaccuracies in the detailed report as options discussed there are not being followed up as landowners were not interested. It is confidential therefore but an Executive Summary is available publically.)

- Character Assessment
by Attleborough Heritage Group is available.

- Education
The Masterplan for Attleborough Academy was shared with the ANP Education Theme Group - it contained full costs of options, some of which are not being followed. A summary of the education work is contained in this evidence base document, but the Norfolk County Council has rights of distribution for the main Masterplan documents. A Theme Group review of Under 5s Provision is also available from the Town Hall.

- Employment
Following a meeting with BC's Employment officer, the advice was to undertake a detailed local economy update study on the evolving local economy in Attleborough as evidence to support the need for and possible options to provide further employment than the Core Strategy requires. This study was carried out by Core Connections Ltd. And is available on request from the Town Hall.

- Play Audit
Reports from consultants commissioned by the Town Council are available from the Town Hall.

2. Demographic data

2.1 The ANP boundary includes a small part of Besthorpe Parish. The most appropriate Census output area date was sought from NCC. It shows the population is growing, although there is a drop in some of the sub-areas.

2011 census qs104ew - sex

ONS Crown Copyright Reserved [from All usual residents population units]

Persons <http://www.norfolkinsight.org.uk/n>

All persons

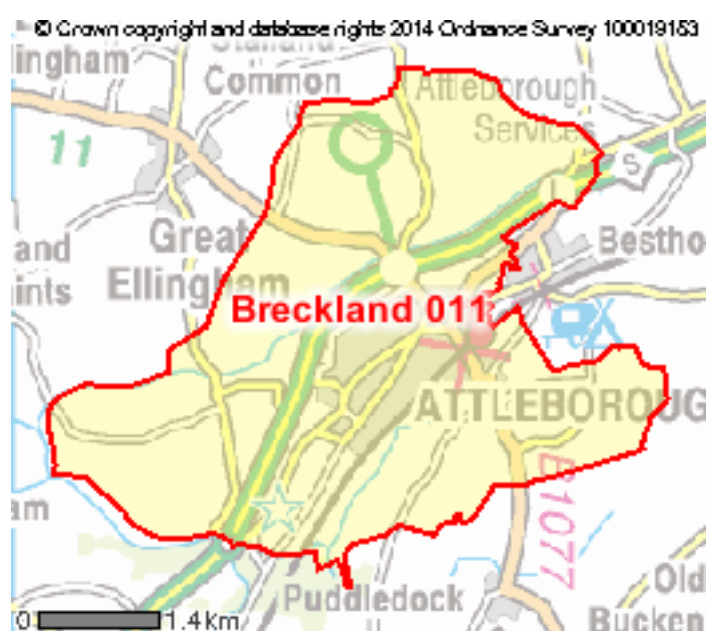
English parish	All persons	Males	Females	Codes
E04006085 : Attleborough	10,482	5,139	5,343	E01026422
E04006091 : Besthorpe	778	399	379	E01026423
	11,260			E01026447
				E01026448
				E01026449
				E01026450
				#E10000020
				#E12000006
				#E92000001

Mid year estimates

Codes	Names	Selected			
		All people			
		count	count	count	count
		2011	2012	2013	2014
E01026422	UB422 - Burgh an	1947	1935	1943	1932
E01026423	UB423 - Burgh an	1823	1819	1868	1919
E01026447	UB447 - Queen's	1512	1546	1578	1593
E01026448	UB448 - Queen's	2268	2298	2288	2319
E01026449	UB449 - Queen's	1977	1953	1976	1977
E01026450	UB450 - Queen's	1784	1846	1906	1935
#E10000020	Norfolk	859400	865300	870100	877700
#E12000006	East of England	5862400	5907300	5954200	6018400
#E92000001	England	53107200	53493700	53865800	54316600
		11311	11397	11559	11675

2.2 The Health & Social Care Theme report looked in detail at the ageing population. It is evident in the Attleborough area (and indeed this is the case for Breckland District as a whole) that the older age population is a significant factor in the local demography, and this will only continue to increase as better life expectancy results in more individuals living longer and with more people surviving well into their eighties. Women are currently living longer than men and this is reflected in the statistics. One of the key drivers of planning and developing services for older people within the Breckland District and more specifically the Attleborough area is the need to prepare for and accommodate their growing numbers.

2.3 The population projections for the wider Attleborough area can be found within the Breckland 011 (Middle Layer Super Output Area) figures produced by the Office for National Statistics. The area covered by these figures is shown in the image below. Based on the population estimates from the Office for National Statistics for 2011, the number of people aged 65 and over living in the Breckland 011 area is approximately 1,964. The latest population projections for Breckland 011 estimate that people aged 65 and over make up approximately 21.7% of the total local population. These figures are higher than the national average for England, currently at an estimated 16.4%. (Office for National Statistics June 2011 Updated 7th June 2013)



3. Theme 1 Employment

3.1 Breckland Council's *Breckland Employment Growth Study* Final Report (November 2013) key points:

Skills and jobs mismatch

“Workforce productivity is relatively low which may in part reflect a slight mismatch in the

local economy between lower skilled jobs available, and a more highly qualified resident workforce, many of which commute out of the District to higher paid employment elsewhere.”

Poor quality accommodation

“Some of the District’s stock is dated and/or poorly specified with evidence that this issue has been constraining industrial activity – specifically the attraction of new industrial occupiers – in the past.” This report considered there was sufficient employment land available. It did note the following: “Over the longer term (i.e. 20 year plan period), it is recommended that any new provision of office space follows an enterprise centre type model, with small units for SMEs and local start-ups and shared workspace and networking opportunities. It is also recommended that any new office space is focused upon Breckland’s town centres, benefitting from a more attractive working environment and range of facilities for staff.”

3.2 The ANP seeks to allocate additional land, and is targeting higher skill employment and opportunities for SMEs to expand. Some 10 ha of land was allocated, in an area of search of 17 ha, but the site would include a considerable area of landscape as a buffer to ensure there is a green gateway for the town when entering from the A11.

Is adding this site strategic?

3.3 In the emerging Local Plan the allocated employment site is set out in the Preferred Sites & Settlements document Attleborough section. That document says: “3.9 The draft neighbourhood plan was subject to consultation until 17th August. The plan focuses on:

- New employment and investment

- The transport network (including walking and cycling)

- New community facilities

- Improving design quality

The 10 hectares of employment land identified in the Preferred Directions is to be allocated in the Attleborough Neighbourhood Plan. The neighbourhood plan seeks to allocate a site for 10ha of employment land located between London Road and the A11. The allocation is in accordance with the strategic policies of the Local Plan (Core Strategy, 2009) and is highlighted in Figure 3.1 'Attleborough'. Attleborough is described here:

http://consult.breckland.gov.uk/portal/planningpolicy/local_plan_preferred_sites_and_settlement_boundary/interim_consultation?pointId=s1453207161772#section-s1453207161772

4. Theme 2 Housing

4.1 The ANP accepts the allocated housing number in the Breckland Core Strategy. It accepts the broad location of a Strategic Urban Extension to the south of the town, as shown in the Proposals Map as the SUE. In the emerging Local Plan the allocated housing sites, the SUE and other sites, and the settlement boundary is set out in the Preferred Sites &

Settlements document Attleborough section. Therefore this is evidence for the ANP housing sites and for clarity housing sites **are not being allocated through the ANP process**. The same document clearly sets out the ANP employment land allocation policy.

4.2 In the Health Theme Group the need for combining social care and housing was identified. The number of people over 65 in Breckland District will continue to increase in the future and this will have important implications for carers, and for both social care and health care services. Hence it is a high priority that plans are developed for sufficient numbers of housing places and care facilities that offer support and care services to meet both the current high demand and the projected increase. Providing a dual use facility would also have the potential to free up homes for families as under occupancy can be reduced. Information is contained in the Health Theme Group Evidence Base. “In one way the opportunity is clear, if older people were able to move into appropriate housing, with care and support available if required, their moves would help ease the wider pressures on the housing market as many larger family homes would be made available for growing families to move into, freeing up smaller properties for first time buyers.” See Theme 5 below.

5. Theme 3 Transport & Communications

Transport - Roads & Rail, Buses

5.1 A number of documents are referred to in the Evidence Base Reference Report, by transport consultants for NCC and for BC. The ANP seeks a transport hub around the mainline rail station where bus and rail interchange can be made easier. The only documentation that refers to this possibility is in the Capita Attleborough Town Centre Transport Study (October 2013) Report on page 104: “A new bus/rail interchange facility would greatly increase public transport integration in Attleborough as the distance between the rail station and the nearest operational bus stop is currently some 650m. There are a number of possible locations for a bus/rail interchange facility including the existing rail station car park. However, the provision of such a facility is likely to be difficult and expensive given requirements for land purchase and geometric requirements to facilitate turning buses, layover bays, etc.

5.2 A cost effective alternative would be to use bus stops located close to the rail station on Station Road. This would provide a similar link between bus and rail and could use the existing bus stop locations, which are currently out of use. However, service routes would need to consider the lack of turning facilities. The introduction of a bus/rail interchange (for services passing the station) is likely to see these stops becoming the timing points for services so that bus and rail services can be coordinated. The timings are likely to be determined by the operator but if expected to serve ‘out commuting’ buses could be expected to arrive shortly before trains AM and shortly after trains arrive PM.”

5.3 As part of improving Queen’s Square, there would be scope to review the bus stop and

shelter here. The study referred to above on page 105 suggests:” The existing bus shelter does little to attract bus users, is unwelcoming and is poorly located in relation to the existing bus stop. Improvements should be made to introduce greater levels of transparency or the facility should be replaced with a bigger, brighter, more transparent facility with improved passenger information (possibly real time), which meets the needs of all potential users”.

Transport – Communications

5.3 Broadband connectivity has a very high degree of support in rural Norfolk. *Norfolk Rural Development Strategy* (September 2013) showed broadband connectivity is a high priority in Norfolk. Digital connectivity was ranked higher than sustainable public transport. “Priorities to Improve Connectivity - consultees were asked to rank a number of ways in which connectivity could be improved across rural Norfolk and the results were consistent across both the consultation events and online survey. The priority given to each issue was: Rank Issue Average score 1st: Universal broadband via fixed line, satellite & wireless which keeps pace with UK average speeds.” Page 46.

Transport – Cycling & walking routes

5.4 The same document quotes safe cycling and walking routes as “not only important for rural inhabitants, they also provide vital infrastructure to support sustainable tourism which is growing strongly. As well as well known routes such as Peddars Way and the North Norfolk Coast Path, other routes can stimulate visitor numbers and support small businesses servicing tourism.” Page 48.

6. Theme 4 Education & Learning

Attleborough Academy – Vision for the development of the site

6.1 We have known for some time about the proposals for Attleborough as a town to substantially grow in size and also that the former Attleborough High School and now Attleborough Academy is the designated secondary education organisation that would be expanded alongside this growth of the town. In view of these proposals, we have been in talks with colleagues at the County Council Education Department for some time about the strategy to expand our provision in line with the proposed growth of housing. The national estimate for growth is for 14 new students of secondary age to appear for every new 100 houses built. So, with a proposed 4,000 houses for the town, this could mean an eventual rise in our roll by over 500 new students taking our student body to around 1,400, including a larger Sixth Form of around 300 students. We have always been aware that these proposed houses would not all appear at the same time– they will be built and sold gradually in phases and we will have no control whatsoever over which year groups the new students enter.

6.2 Whilst the NCC uses a formula to estimate, there is no guarantee of a definite number of new students of known ages per 100 houses. (See Table 6.1 below) They might in practice all need to go into just one of the Academy Year Groups; but it is also possible that they might all be of Primary School age. It simply depends on the profile of the families who move into the town. Unless the completed expanded Academy with all the new buildings were to be in place before the new students arrive, planning to accommodate them was always going to be a challenge, and so we set about with the County Council drawing up the Masterplan to stage the growth of the Academy facilities in line with predictions for the rise in student numbers. The Masterplan was originally completed in March 2014 and then updated in October 2015.

6.3 Due to the expertise and resources in our Transforming Education in Norfolk (TEN Group, explained in full in para 6.8 below), we were successful in a bid to receive a portion of the ring-fenced £2 billion available from the Government funded ‘Priority School Building Programme’. We were one of only five schools in the County and also one of only 277 schools nationwide to have been chosen. This bid centred on the construction of one of the first stages in the original Masterplan and the current Education Funding Agency (EFA) plan is to start the design for this in 2017. “Ever since I became Headteacher - now ‘Principal’, I have pledged to develop our site with the needs of the community in mind so that any new facilities can be of full benefit to the community and not just sit unused and in darkness after the ‘school’ day. I have therefore attended the many meetings of the Neighbourhood Plan Steering Group Committee to try to ensure that the Academy Master Plan and the Neighbourhood Plan were united in proposing facilities, which have mutual benefit for the community and the Academy” Neil McShane Education & Learning Theme Group, Principal Attleborough Academy Norfolk, June 2016.

6.4 We did, indeed, plan and host the launch of the awareness of the Neighbourhood Plan at the then High School in October 2013, whereby we took the whole school off timetable and all students worked with various experts to propose their own ideas for the future of the town. The whole community were then invited in to view the students’ ideas. Since this time, there have been many meetings of the ANPSG at the Town Hall and it has been heartening to see the determination and the resilience of the members of this committee all pulling towards achieving the best possible results for the town.

Sports Options

6.5 Our own vision for the development of the site has always centred on two opportunities for growth on the site: 1) to develop our Sports provision in conjunction with the development of the Sports provision for the community in the town 2) to provide plans for taking over the current Attleborough Infants School site in order to create a new Sixth form and Community Education and Enterprise Centre. We therefore drew up plans for a possible ‘Sports Village’ some four years ago and presented them at the Community Meeting held at that time. Since that time, we have become aware that we are due to be given a tranche of

land behind our current playing fields near to the A11. We have therefore commissioned a feasibility study to explore whether we could build a community 'Sports Arena' on this land with a view to converting the current Sports Hall into an Academy /Community Theatre. These plans are still being discussed for integration into the final Masterplan and the draft Attleborough Neighbourhood Plan.

Skills development

6.6 The current Attleborough Infants School site is situated directly between the Academy site and the Adult Education Centre ("ACE" Centre). In the growth plan for the Attleborough area, a newly built site is proposed for Attleborough Infants School and for them to become a Primary School around Christmas 2017. If we are to inherit and develop on their current site, it makes sense to develop a facility that not only benefits Sixth Form provision for the area, but as well will be benefitting the community in terms of adult training and also the business and enterprise community. The vision is therefore to create a diverse education and training provision on this site which will not only meet the educational needs for Sixth Form students but will also contribute to fulfil the training needs of the current and future workforce for local business and industry and potentially the retraining needs of adults within the community. We would look to join up provision with the current ACE Centre rather than stand in competition with it.

6.7 The development of a diverse and inclusive provision for Sixth Form age students, which will benefit students in the area, fulfils a greater need than simply creating another 'academically focussed' provision. It will be prudent and more beneficial to both maintain a Sixth Form with an academic emphasis and also to widen the provision to include a strong technical and vocational and a 'STEM' (Science, Technology, Engineering and Mathematics) Centre of Excellence. We have been in discussion about the strategic vision for this site with our partners who form the 'All Routes Trust' for some time. 'All Routes' comprises the five main high schools in the area: Attleborough Academy, Hethersett Academy, Old Buckenham High School, Wymondham High Academy, Wymondham College and also Chapel Road Special School. The development of this type of provision has the complete backing of 'All Routes' as it would be a boost to all students in the area.

6.8 Attleborough Academy Norfolk is part of the TEN Group, "Transforming Education In Norfolk". This group also includes City College Norwich (CCN), the University Technical College Norwich (UTCN) and Wayland Academy (WAN) all of whom have specific and considerable expertise in Technical and Vocation Education. The collective expertise of this group in this field is unmatched in this area. This gives the proposal unrivalled credibility and an authentic opportunity with the maximum chance of success.

6.9 The new provision would facilitate progression to University or the world of work and it would help young people to be well rounded and able to access both Higher Education and the world of work: possessing the skills that meet the needs of our local economies. We

cannot, however, achieve this vision alone. We will need to create the right employer engagement and curriculum mix whilst still retaining academic rigour and aspiration.

6.10 We have already held tentative talks with some local businesses with the idea of setting up sector ‘Academies’ so that we, in a true partnership with local business, can start to fill some of the skills gaps that local businesses are experiencing. This could well mean that local businesses will sponsor or coach, mentor or teach in the new skill centre. Some have expressed a desire to develop rooms and areas on the new site in order to have their own sector Academy built there.

6.11 “The expansion and development of new facilities therefore provides exciting new opportunities but we are very aware that whilst growth in student numbers will be healthy in providing greater opportunity, we will need to wholeheartedly retain our focus on care, respect and inclusion which has always been at the heart of our core values”. Neil McShane Education & Learning Theme Group, Principal Attleborough Academy Norfolk June 2016.

Under-5s provision

6.12 The provision for under-5s was studied and demonstrates there is sufficient provision to meet current needs. The new primary school on London Road that will open in 2017 will be adding a further 52 nursery places.

Calculating the pupil numbers

6.13 To calculate the likely number of new school places required as the town grows, the NCC *Planning Obligations Standards* (April 2015) is a guide.

<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/planning-obligations>

In order to assess the number of new children likely to arise from a new development the County Council has undertaken an analysis of recent development in the County (2012), which has resulted in the use of the following pupil generation figures (based on expected children per 100 dwellings):

Table 6.1 expected children per 100 dwellings

Age range	No. years cohorts	Type of school	Multiplier (no. of Children)
2 - 4	3	Pre - School	9.6
4 - 7	3	Infant	12.2
7 - 11	4	Junior	13.9
4 - 11	7	Primary	26.1
11 - 16	5	High	17.3
16 - 18	2	Sixth Form	1.7
Total			54.7

NCC *Planning Obligations Standards* (April 2015) page 7, and pages 9-10.

For affordable housing the assumption is that families “move from elsewhere” locally so children are already at the local school. Of course in practice some of the pupils in all the new houses will already be at the school.

Early option for relocating the Academy

6.14 As explained in the Sustainability Assessment options description, at an early stage in discussion the idea of moving the secondary school to a totally new site was mooted, but subsequently dropped as the Academy Masterplan emerged to accommodate growth on the existing site. The ATC letter of 25 September 2008 to the planning policy team at Breckland Council in response to their site specific consultation stated: “002 018 Part of the area should be designated for schools, adjacent to the sports /recreational areas which would be serviced from the southern relief road. If the High School were moved to this area the current school site could be redeveloped for retail and extra car parking, thus improving the variety for shoppers in town centre and keeping the character of the town. The questionnaire revealed that residents do not generally want the town centre to be moved, but improved, and through traffic removed.”

7. Theme 5 Health & Social Care

Priority one – a new doctors surgery and health care centre

7.1 There is one GP Partnership, operating from two sites located within the town of Attleborough. GPs serve 17,400 patients both in the town and from surrounding villages including Morley, Deopham, Little Ellingham, Great Ellingham, Rocklands, Lower Stow Bedon, Shropham, Snetterton, Eccles, Wilby, Quidenham, Banham, New Buckenham, Old Buckenham, Carleton Rode, Bunwell, Besthorpe and Spooner Row. The existing premises are not fully fit for purpose and often place limitations to how primary care services are organised and delivered. The decisions on the surgery provision therefore affect a wider area than encompassed in the ANP boundary.

7.2 Adjacent to the GP practice’s premises on Station Road is the Attleborough Health Clinic, offering community health services which include district nurses, podiatry/chiropraxy, health visiting, physiotherapy, dental, speech therapy, dietetics, cognitive behavior therapy (CBT), baby clinic, midwives, leg ulcer clinic, continence, volunteer coordinator and visiting clinicians.

7.3 The conclusion that has been reached by the practice is that to expand existing facilities on the Station Road site would address the need to operate from a single site and would enable the practice to design an environment suitable for the delivery of high quality health care to its patients. The Station Road site is ideally suited to provide good access to existing patients and to serve new residents as housing development takes place in and around the

town. The practice could, with the right premises, improve access, move care closer to patients' homes and move towards integrated provision of care. The full report and options analysis is given in the separate document available from the Town Hall, to inspect at the Library and as a downloadable document. Parts relate to options that were not followed, as other options were chosen.

7.4 The evidence of needs set out in the demographic work described above in paras 2.2 and 2.3, led to the Health & Social Care Theme Group setting a second highest priority policy and action: building a dual registered high dependency unit. The evidence of current provision is that only less than 10% of the expected demand can be accommodated within 5 miles of the centre of Attleborough. The unit would need to have in order of 65 beds to accommodate:

- Early release from hospital
- Admission avoidance
- Step up, step down beds
- Dementia care
- End of life care

Work to seek a suitable site is under way.

7.5 The housing implications of the evidence in the Health Group commissioned study are ones the Attleborough Neighbourhood Plan must seek to address. "In one way the opportunity is clear, if older people were able to move into appropriate housing, with care and support available if required, their moves would help ease the wider pressures on the housing market as many larger family homes would be made available for growing families to move into, freeing up smaller properties for first time buyers. We have evidence that we need to innovate and improve existing models for providing Housing with Care. The Joseph Rowntree Foundation (JRF) reports that where older people rent or lease self-contained flats within a complex, in which there is also on-site care and support, as well as catering and other amenities, those facilities were generally found to promote the wellbeing and rights of people with high support needs. The challenge is to supply housing affordably for the large numbers of older people who will want to live in such accommodation. The Neighbourhood Plan thus offers a once in a lifetime opportunity to recognise and meet this need with local services and local housing opportunities. Aylesham's provision is a potential model to aspire to". Healthcare Report 2015 by consultants, commissioned for the ANP.

7.6 As part of setting the Health and Social Care Objectives close links to Transport and Sport, Leisure and Community Facilities objectives emerged. This is backed by research by Inclusive Design for Getting Outdoors (I'DGO), which indicates that good design of gardens, streets, neighbourhoods and open spaces has positive effects on older people's ability to age well and live independently, preventing increased admissions to hospitals and residential care homes. The design policies in the ANP should therefore be considered when the Health and Social care facilities are designed.

8. Theme 6 Sport, Leisure & Community Facilities

Indoor Sports

8.1 The main mechanism for assessing demand for indoor sports facilities (sports halls and swimming pools) is the Sport England Facilities Planning Model (FPM) <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>. This identifies theoretical demand based on the population profile within a given catchment. Demand is then compared to existing supply to calculate the nature of any deficit or oversupply in provision. Therefore we start from the population likely to be generated by the growth in Attleborough, combined with predicted trends in the existing population. Sport England has undertaken a “run” of the FPM for Breckland, covering sports halls, swimming pools and artificial grass pitches. This is for the year 2014, and provides no projections for population growth. Its findings must always be caveated in that it is a theoretical model and it assumes the facility data used is accurate. With regards to the impact of future population growth it is possible to evaluate the increase in demand generated specifically by new housing developments through use of the Sport England Facility Planning Calculator (FPC).

8.2 Attleborough’s current provision is the four badminton court, dual use sports hall at the Academy. Constructed in 1982 it provides basic accommodation, but in terms of size it is deemed appropriate to meet the current needs of the town. However, evidence obtained from Local Sports Clubs and organisations paint a different picture: that the facility is not fit for purpose physically and its current sharing management set up not conducive to community use. Current health and fitness provision is limited to a private gym with circa 26 equipment stations, and a very small facility at the Sports Centre. A further private gym, predominantly weights based, sits on the outskirts of the town. Apart from what is effectively a learner pool at Chapel Road School there is no swimming provision in Attleborough, and this will go when the school moves to its new site in Old Buckenham. According to the Sport England FPM there is inadequate demand to justify a pool currently in Attleborough. There are, however, community pools within what is modelled to be an acceptable travel time at Wymondham and Thetford.

8.3 According to the Sport England Sports Facility Calculator, the future growth of the town warrants the provision of a further three to four badminton court hall (3.58 courts). Options for provision are as an extension to the current four-court hall at the Attleborough Academy, or construction of a new sports hall on a different site with a six-court hall and an additional one court ancillary hall, or an eight-court hall. There is also a need for a sports arena for the excellent Attleborough Boxing Club to hold tournaments, and therefore an eight-court hall would be preferred. Based on national benchmarks it is estimated that the growth in the population could sustain another fitness facility with a minimum 70 equipment stations and

ancillary studios. Logically this should be based as part of the overall community indoor sports complex.

8.4 Based on the FPC the town could support as a self-contained entity a 25m x 4 lane pool, but with the additional demand created through the population growth only equating to 0.58 of a pool and it is still difficult to justify what can be a costly facility whilst there are other pools that can serve the catchment. The planned growth of Wymondham and Thetford themselves could impact upon the demand for their own pools, changing the projected position. In September 2013 the Greater Norwich authorities of Broadland District Council, Norwich City Council and South Norfolk District Council commissioned naa to produce an indoor sports facilities needs assessment for Greater Norwich, and this has identified the pool at Wymondham as being at capacity by 2026 without taking into account the growth of any population outside of their District. Their evidence base considered the projected population growth and housing allocations, plus the aging of the core resident population to assess impact on the demand for facilities up to 2026. Source: *Greater Norwich Indoor Sports Facilities Strategy* for Broadland District, City of Norwich Council and South Norfolk District Final Report (October 2014). http://www.south-norfolk.gov.uk/planning/media/G8_Greater_Norwich_Indoor_Sports_Strategy_Oct_2014.pdf

8.5 However, there has been no district-wide assessment for Breckland to take account of growth in Thetford itself, and the growth to accommodate in South Norfolk, so the figures for spare capacity are likely to change. The ANP Sport Theme Group concluded: “The recommended solution to deciding the position would be for Breckland Council to commission Sport England to re-run the FPM with a number of scenarios for future population growth for the whole district. In the meantime this report recommends that contingency is made to ensure a pool could be provided as part of an overall community indoor sports hub should the need be proven in the future”. There is a case for S106 developer contributions collected for Attleborough’s growth to be spent in Attleborough: the evidence case is that developer’s contributions should contribute to new provision where it is required, and also to enhancement of the existing sports facilities stock based on where the housing allocations and developments will take place, and where the catchment area of an existing facility includes this new housing area. These are all included in the facilities evidence base findings and assessment.

8.6 Management of joint facilities is a key factor. The *Greater Norwich Indoor Sports Facilities Strategy* identifies this as a problem in adjoining local authority areas, including Wymondham: “Allied to improvement in the physical stock of the buildings is then determining who manages and who operates the buildings for education and community use – based on a core business model and operational business plan for each site. This is an essential and integral part of the total feasibility. The strategy has identified a current fragmented approach to community use of school sports facilities. If there is to be investment in the stock there also has to be investment in the management and operation of the buildings

based on a defined core business case, operational business plan and with experienced sports centre management leadership.” From page 73 *Greater Norwich Indoor Sports Facilities Strategy*.

8.7 The evidence in para 6.5 above in the Education Theme Group identifies the proposal for going forward for the ANP, and the report on a possible way forward is expected in the Autumn 2016. Monitoring and evaluation of the indoor strategy is as important as the creation of the initial strategy to successfully deliver improved provision of indoor sports and recreational facilities over the longer term.

Outdoor Sports Hub

8.8 There is only one main club in the town which is beginning to expand and concerns about the limitation of the number of pitches on future growth of junior football has been expressed by the club. The town has two sites for football – the Recreation Ground (the Rec) and Gaymers Field. The Rec is serviced by a dated pavilion building in need of refurbishment, and Gaymers Field by a portacabin used for changing. The Rec is host for adult/youth matches whilst the focus of Gaymer’s Field is youth and younger age football. There is currently no artificial grass pitch (AGP) provision within the Town. The Academy has hard courts for tennis and netball, which are available for community use outside of school time, managed by the Academy (but not well advertised and underused). The cricket club based at Old Buckenham has no plans to relocate back to Attleborough but provides the infrastructure for new participants and can further develop through outreach programmes. To facilitate this, and to cater for “social” sides during the summer it is recommended that the proposed Outdoor Sports Hub for Attleborough should include an artificial cricket wicket that can be used for development activities and matches during the cricket season.

8.9 There is an Open Space deficiency as outlined in the *BC Open Space Assessment 2015, Open Space Parish Schedule A-C*, (available at:<https://www.breckland.gov.uk/article/2455/Documents-Library-Publications> scroll down to evidence base). This shows there is currently 12.35 ha available, a 6.15 ha deficiency in open sports space using NPPF standards. The Rec is site A2 on Map 1 (3.54 ha) and Gaymer’s Field is site A31 (7.8 ha) on map 6. Besthorpe Parish has no Open Space. The ANP Theme Group recommends using either the *Beyond the Six Acre Standard 2015* Planning Guidance for Outdoor Sport and Play produced by The Fields In Trust (FIT) or the local standards set by Breckland Council, whichever is greater. The standards proposed in the emerging Local Plan are higher and identifies a deficit - in line with the evidence of our Theme Group’s work - the ANPSG wishes to support this standard. This clearly identifies qualitative as well as quantitative guidance, which is welcomed. All new planning applications will need to meet this guidance as a minimum standard.

8.10 The ANP preferred option proposes that all Outdoor Sports Provision is based at Gaymer’s Field with a new Pavilion incorporating changing, storage, parking and social

facilities. Using locally derived planning standards the future growth of the town is likely to lead to a requirement for a further three to four adult size pitches or equivalent, together with the necessary ancillary accommodation (e.g. changing provision). Future provision for spectator stand and necessary perimeters should the football club progress up the divisions and have more stringent league requirements placed upon them will be included.

8.11 The policy in the draft ANP is that Gaymer's Field needs to be expanded by the supply of additional land in order to incorporate an Artificial Games Pitch (AGP) and to accommodate future pitch and ancillary facility provision. The additional land is identified in Theme 7 below. The AGP would be used for the training needs of the football club, and to move five a side football outside, freeing up indoor space for other activities. The Sport England Sports Facility Calculator indicates that for the expanded population, the equivalent of 0.6 of a full size AGP is justified, with 0.33 of a pitch generated by new population growth. However, discussions with Sport England indicate that the lack of a full size AGP provision with 3G pitches of synthetic surface technology designed for football and rugby at both competitive and recreational levels in the wider area, leads to an identified potential for a full size pitch within Attleborough (in 3G turf, the pile of artificial grass 'blades' is supported by a thin base layer of sand, and by an infill of rubber crumb). The full and executive summary Consultants Reports commissioned by the ANPSG are available on request from the Town Hall.

Outdoor Play Facilities

8.12 Attleborough Town Council currently manages 6 equipped play areas on Lomond Road, Norfolk Drive, Cygnet Close, London Road, Station Yard and Gaymers Playing Fields. A deficit of 6.07 ha is shown in the children's play space assessment in the *BC Open Space Assessment 2015*, Open Space Parish Schedule A-C, (available at: <https://www.breckland.gov.uk/article/2455/Documents-Library-Publications> scroll down to evidence base). It was based on a qualitative and quantitative audit of all outdoor sports facilities and playing pitches completed by Breckland Council between August and November 2014. The methodology for the purpose of this study has had regard to the principles contained within FIT and Sport England 'Assessing needs and opportunities guide for indoor and outdoor sports' (2014) to establish the quality, quantity and level of playing field provision of all outdoor sports and pitches/play areas within Breckland. The assessment also states that with regards to play value the play areas within Attleborough are below average in all three categories (toddler, junior and teenage). The Town has no NEAP (Neighbourhood Equipped Areas of Play). Using the average size household of 2.3 taken from MSOA E02005513 (Breckland 011) 2011 Census Office for National Statistics (ONS) table KS403EW January 2014, the future growth of 4,000 houses equates to an estimated population increase of 9,200. This should generate the minimum requirements for around 2.3 hectares of equipped designated play areas (LAPS, LEAPS, NEAPS) and 2.76 hectares of other outdoor provision (MUGA's, Skateparks etc) utilising the FIT guidance. Currently there is no Indoor Play Provision within Attleborough. The nearest indoor play facility

(Hullabaloos) is based at London Road, Wymondham (6 miles away) and is privately operated. Links to this by public transport is very limited and it is not easily accessible by foot or bicycle.

8.13 Although developers are not legally required to make up the current deficiency of Play Areas as identified above, the ANP would seek S106 contributions from new development to enable refurbishment of the existing play areas and the creation of an exemplar interactive Play Hub at the Recreation Ground on Station Road. *Guidance for Outdoor Play: Beyond the six acre standard* has been produced by FIT to reflect the National Planning Policy Framework (2012), the National Planning Policy Guidance, and the introduction of The Localism Act (2011). The legislative background for play is summarised on page 3, and guidelines on standards on page 6 of the above document so not repeated here.

<http://www.fieldsintrust.org/Upload/toolkit/pdfs/Guidance-for-Outdoor-Sport-and-Play-Oct-2015.pdf>. This play hub would include a range of interactive Outdoor Play equipment for all ages and would be a central point of focus for Outdoor Play Provision for Attleborough and its surrounding communities. It would be classified as a 'destination play area'. Although the creation of the Play Hub will not solve the local deficiencies it will contribute to the overall provision and will assist with social cohesion between the existing town and the additional urban growth. The possible relocation of the Attleborough Town Football Club to a new Outdoor Sports Hub on Gaymer's Field may give an opportunity for Attleborough Town Council to provide an Indoor Play Centre within the existing building presently used by the Football Club. If this facility also included a catering outlet and public toilets it would provide a facility much needed in Attleborough where parents and children can interact throughout the year. The key requirement in informal play is that it is stimulating and interesting for the children. **A Play Space Audit and Play Policy have been completed for Attleborough Town Council and a Play Strategy is now under way**, we hope it reminds us all about the experience of childhood so that implementing the ANP can offer an exemplar of a play strategy in practice.

8.14 There is growing research evidence that increased opportunity for free play is the most effective way to ensure this for children, and that a range of increasing health problems are associated with the decline in play opportunities. The chief medical officer advises that "children and young people should achieve a total of at least 60 minutes of at least moderate-intensity physical activity each day" Chief Medical Officer Department of Health (2004) *At Least Five a Week: Evidence on the impact of physical activity and its relationship to health*. We envisage the following broad categorisation into which this neighbourhood play provision will fit, to help the town despite the current deficit in the smaller areas. "The typology show below (adapted from the Mayor of London's Guide and based on research by the Centre for Transport Studies (2004) *Making Children's Lives More Active* University College London) gives further insight on a neighbourhood level of play and how it would fit into the LAP, LEAP and NEAP hierarchy. "**Unequipped space** – while there is no equipment or specific design for play, the area is suitable and used for play. It may only be

practicable to audit such spaces if undertaken as part of a wider open space audit.

Toddler/doorstep – small space near housing specifically designed for play – may or may not have some small items of equipment for toddlers and seating for adults (similar to NPFA’s LAP). **Small equipped** – primarily aimed at under eights with, say, three to five items of equipment and seating. Near to housing. **Large equipped** – aimed at 5–11s with a larger range of equipment, say, four to eight items and space/design for ball games, wheeled sports etc. Seating available and located near to housing. **Neighbourhood** – providing for all children including teenagers. Facilities as for large equipped but with additional equipment challenging to older children; youth shelter type provision; and floodlit MUGA and/or wheeled sports facilities. These sites will serve a considerably wider area than the above four.” From page 48 of *Planning for Play* Play England National Children’s Bureau / Big Lottery Fund, (March 2006) http://playengland.org.uk/media/120480/planning_for_play.pdf

What is play?

‘ Can you remember digging in the mud for worms?
Or making perfume from rose petals?
Or just hanging out with friends, talking about things, or listening to music?
Or walking with your eyes closed to see what it felt like? Climbing trees? Playing pranks on grown-ups? Doing things you knew you shouldn’t? Making things, reading, dreaming, hanging out, running, jumping, making yourself dizzy, pretending to be someone else?
’

Gloucestershire Play Policy, (2005) from http://playengland.org.uk/media/120480/planning_for_play.pdf.

Encouraging walking & cycling

8.14 The Town Council receives many complaints regarding the conflict between dog walkers and Outdoor Sports participants. Evidence obtained through the ANP consultation also shows that the Attleborough based Health Walks (supported by Fit Together, Walking for Health, The Ramblers & Macmillan Cancer Support) who meet monthly, regularly have to meet in the Town Centre and drive to more suitable venues. This is due to the lack of Informal Space and circular walks within Attleborough. Public footpaths are sporadic and not joined up. Natural and semi-natural green space is important for amenity value, wildlife conservation, educational purposes and recreation. Natural England believes that natural and semi-natural green space is important and everyone should have easy access. They set up a standard for the provision of natural and semi-natural green space, known as the English Nature *Accessible Natural Green Space Standard* or (ANGST). It recommends that at least a 2ha accessible green space is available per 1,000 people, based on no one living more than 300m from the nearest area of natural green space. It also recommends that no one should live 2km from at least one accessible site of at least 20ha; 5 km from at least one accessible site of at least 200ha; and 10km from at least one accessible site of 500ha. For the future growth of 4,000 houses, which equates to an estimated population increase of 9,200, the town

needs an additional 7.36 hectares of parks and gardens; 5.5 hectares of amenity green space' and 16.56 hectares of natural and semi natural green space. The possible relocation of the Attleborough Town FC to an extended Gaymer's Field facility would release 'informal open space' on the Rec.

8.15 The ANP recognises that with the new urban extension being predominantly south of the barrier of the railway line, without careful planning this could develop as a separate area of the town. The linear park would be linked to the existing town in strategic places through the provision of footbridges across the railway line. This would also assist Network Rail to close some crossings across the railway line. The linear park would also offer an opportunity to developers to build high value 'Executive Housing' along its boundary. Open space including cycleways, footpaths and bridleways would allow interconnectivity and meet the transport objective of delivering 'Smarter Choices'. More sustainable transport options would assist with fitness and sociability and offer the potential to reduce vehicular journeys, and the connectivity will promote social cohesion between the new and existing neighbourhoods, as well as contributing positively to health. The ANP vision is to deliver a Linear Park/green corridor offering linked open spaces running from Decoy Common to Hargham Woods. The Linear Park should run from west of the proposed extended Gaymer's playing fields towards Hargham Woods following the route of the Attleborough Stream. This would enable the urban extension development to use a Sustainable Urban Drainage System (SUDS) as well as providing movement corridors both for people and wildlife. More evidence on the environment is given in theme 7 below. The green corridor would run from the east of Gaymer's Playing Fields along White House Lane linking to Decoy Common, as shown diagrammatically on the ANP Proposals Map 2016. The provision of a Linear Park/green corridor here will also go some way towards reducing the loss of wildlife habitat and flora and fauna caused by the new urban extension. The Linear Park route along the Attleborough Stream south of the rail line is indicated very approximately as a linked series of green spaces on the Proposals Map. Its extent will be approved in the SUE Masterplan. The developer/promoter for the main land areas in the SUE has been consulted about this proposal and is in agreement with the aims and broad location.

8.16 The SUE Masterplan and other planning consents and S106 agreements should provide detailed layouts showing land allocated for the facilities. The Linear Park should not however be seen as a replacement for Open Space provision within the new urban extension. That will need to demonstrate it confirms in terms of outdoor sports, all dwellings in major housing areas must be within 1.2km of outdoor sports areas as recommended by FIT. Outdoor sport areas should be located near to public transport routes, have good provision for car parking and have easy access for pedestrians and cycles. In terms of children's play areas, all dwellings in housing areas should be within 100m of a local area of play (LAP), 400m of a local equipped area for play (LEAP) and 1000m of a neighbourhood equipped area for play (NEAP) as recommended by FIT.

Allotments

8.17 Attleborough Town Council (ATC) currently manages 37 allotments (18 in Chapel Road, 19 Queens Road). Additional allotments (39) are being provided via S106 agreements on London Road (allotments -Taylor Wimpey). Further allotments (unknown quantity) are also being supplied as part of the Norwich Road development (Gladedale). ATC currently has a waiting list of 50 residents. During the last year there has been a turnover of approximately 8 allotments and in previous years this has been a lot lower. Therefore it takes on average 6.25 years to be allocated an allotment. The Town Council has to provide a sufficient number of allotment plots for their residents if they consider there is a demand. There are no formal national standards for provision; the level and standard of provision should reflect local demands, which will vary from place to place. Provision refers not just to the number of plots, which may vary in size, but also to aspects of quality: the quality of the land (simply making derelict land available to prospective tenants does not amount to the provision of allotments), and the quality of infrastructure. Standards of provision have usually been specified in terms either of land per 1000 population or plots per 1000 households. The document *Growing In The Community* (2nd Edition) produced by the Local Government Association (LGA), and advice from the National Allotment Society together suggest the ANP will require a minimum of 20 plots per 1000 households. With the allocated growth of 4,000 houses this would indicate a need to provide an additional 80 plots. However, since the adoption of the Core Strategy in 2009, 1,500 houses have been permitted of which some allotment provision was granted as S106 conditions. The ANP will adopt the *Growing In The Community* (2nd Edition) guidelines as produced by the LGA, it is available to download at http://www.local.gov.uk/publications/-/journal_content/56/10180/4045787/PUBLICATION

Cemetery space

8.18 Although it is the public law duty of the Church of England to provide for burials in open churchyards, there is at present no statutory requirement on any public authority or private undertaking to make available a place for burial. Provision of burial grounds is also dependent on the normal application of planning legislation. No dispensation in relation to burial grounds is provided, nor are there any financial incentives or relaxation of financial burdens. At the same time, there are no additional planning or other requirements or regulatory procedures placed on the establishment of burial grounds (although regard will be had for environmental protection). In contrast with cremation legislation, there is no obligation to notify any local or central government authority that a cemetery has been opened (or closed). The development of new burial grounds (including single graves on private land - “back garden burials”, woodland burials and “green” burial sites) is largely unregulated. Planning permission has been recently granted to build a new crematorium, to be privately run, at Scoulton between Watton and Hingham to be open for November 2016. Woodland burial sites are also available with the nearest site being at Colney, Norwich or near Bury St Edmunds. To enable the Town to secure future provision for the next 100 years an amount of 10 Hectares (25 acres) of suitable land is required.

8.19 The Consultant's report on sports, *Options Appraisal for the Provision of Sport and Leisure Facilities: A Report to Attleborough Town Council Executive Summary* February 2015 used as a reference for ideas and options in the ANP, has the following caveats:

“The first is that, although the study does its best to take account of factors outside of Attleborough that might impact on proposed provision, the lack of an up to date sports and recreation needs assessment for Breckland as a whole, and which this study could cross reference, is a weakness and one that needs to be addressed by Breckland Council.

The second is that this study is one of a number of studies being undertaken into the future needs of Attleborough's infrastructure. Its findings need to be taken into consideration in the light of the findings of the other studies to ensure a “joined up” approach to the future use of various sites. This may impact upon some of the recommendations in this report.

The third is that the study establishes the basis for future applications to funding bodies. However, it is not a substitute for the preparation of detailed applications, and as such would need to be supplemented by more detailed work for any such applications to be successful”.

9. Theme 7 Environment, Sustainability and Design

Green Infrastructure and Linear Park

9.1 The NPPF (para 73) states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. In the section under Green Infrastructure for Attleborough the Norfolk Infrastructure Plan NCC (October 2014) on page 45 notes there is “none currently identified”. There is no district wide assessment of informal open spaces or of Green Infrastructure (GI) in Breckland: as evidence however, the ANP has considered the BC Open Space Assessment (2015) and the spaces listed in its appendix A - C Parish Schedule in Attleborough and Besthorpe. These spaces lack links. For our evidence base we have also used *The Greater Norwich Green Infrastructure Strategy: a Proposed Vision for connecting people places and Nature* GNDP / Chris Blandford Associates (November 2007), which shows two sub-regional green infrastructure corridors that pass near to Attleborough (in figure 7.1). These would provide access and movement, biodiversity, water and flood management, enhancement and promotion of countryside and of recreation and leisure, with “connections between communities, accessible greenspace and destinations.” The recommendation “embedding the GI approach into local planning documents both for allocation purposes and to assist developers (page 8) ” is taken forward in the ANP. However The Linear Park and green corridors proposed in the ANP will offer a new link from the strategic GI corridor 3 through Attleborough to the strategic GI corridor 4 to the south of the town. The Linear Park would also help to meet objectives and policy in the ANP, and in particular the ANP objectives ESD1 to provide an integrated strategy for Open Space

and Green Infrastructure for the town, and ESD3 to improve existing open spaces and designate local open spaces, and the policies that follow from them.

Urban Tree cover

9.2 The Conservation Area gives protection to trees in the town centre, but the *Attleborough Neighbourhood Plan Character Assessment* (November 2016) report draws particular attention on page one to the place setting, and in particular to “the chestnut trees in the Rectory Gardens and along Station Road”. The two Significant Tree avenues in the ANP pick up specifically on this point, meeting objective ESD 2 to maintain tree cover. Elsewhere in the town planting five new trees for any removed will ensure carbon capture is continued, and over time the town can benefit from new mature trees and this will also help shade areas for walking and cycling along. Many of the benefits of planting and methods to implement tree policy are evidenced in *Trees in the Townscape A Guide for Decision-Makers* Trees & Design Action Group Issue 2 (December 2012), available to download from <http://www.tdag.org.uk/trees-in-the-townscape.html>.



12 Principles for Urban Trees from Trees & Design Action Group

Local Green Space

9.3 The policy objectives in the ANP for local open spaces meet Section 8 of the NPPF entitled Promoting Healthy Communities. This provides guidance on a new designation of Local Green Space (LGS) to provide special protection against development for green areas of particular importance to local communities. “Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate

neighbourhood planning.” The relevant guidance is in paragraphs 73 and 74, and in NPPF para 76: “By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.” Para 77 gives criteria.

9.4 The ANP draft set two areas to add to the most important long term protected Green Spaces in the town:

- Decoy Common Proposals Map site C
- Gaymer’s Field Extension Proposals Map site D

Detailed maps are available on request at the Town Hall. On the Gaymer’s Field Open Space itself the ANP will permit the building of a sports changing room as an entirely appropriate building. We do not agree with BC that such a building is inappropriate in a designated open space where the reason for designation is recreation, as otherwise playing fields appear to have no legislative protection beyond the period of a single plan. In making Gaymer’s Field and its extension a Local Green Space for recreational purposes (as set out in Theme 6 and the supporting evidence above) the aim is to also, as part of the policy of moving the Football Club to a larger site nearer the new housing development to at the same time release the Rec to become a much more informal area with wildlife opportunities, children’s play of a stimulating nature, and tree planting. Informal Open Space is in great demand, especially for families, and for dog walking exercise.

9.5 The Local Green Spaces section in the BC *Open Space Assessment* (2015) states “the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan” (para 8.15 sixth bullet point). We have written to the owner of the proposed Gaymer’s Field Extension Local Open Space, but he is not willing to see the land used for playing fields, does not wish to sell it and will consider whether it would be appropriate to assign it as a Local Green Space. Instead Attleborough Land has offered two sites for extending Gaymer’s Fields facilities, as shown on ANP Policies Map 1. We would consider if these would be suited to an AGP, and whether an AGP use would meet the requirement that “Designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners” set out in the seventh bullet point of the above BC report. We would be open when reviewing and monitoring the ANP in future to the suggestion in the final bullet point: “Land designated as Local Green Space may potentially also be nominated for listing by the

local authority as an Asset of Community Value. Listing gives community interest groups an opportunity to bid if the owner wants to dispose of the land”. Decoy Common, the second Local Green Space or Local Open Space area in the ANP, is subject to on-going purchase negotiations by the Town Council Decoy Common has been managed by for amenity and environmental conservation purposes. It would however continue to be managed for biodiversity and to protect the species rich habitat by Norfolk Wildlife Trust. Their report, and the actual site boundary are both available on request at the Town Hall.

Biodiversity Evidence

9.6 The ANP has two remaining objectives for the environment: improving water courses and reducing flood risk ESD 4, and protecting existing landscape features and enhancing biodiversity EDS 5. The impacts of development on climate change should be minimised through the use of renewable energy and Sustainable Drainage Systems (SuDS). The ANPSG and ATC planning committee will therefore monitor and appraise such schemes as they come forward. Just outside of the ANP area there are a number of nature reserves and natural areas, which are important for their biodiversity. The green spaces within the ANP area act as important buffers between urban and rural environments, as would the proposed Linear Park and the green gateways to the town. The management and enhancement of habitats will be supported by a combination of landowner actions, developer funding, fund-raising and voluntary activity. The key to delivery of Attleborough biodiversity aspirations will rest on influencing the way land is managed and used and through control of land and buildings. Landowners in the ANP area are already participating in Environmental Stewardship schemes and this may be extended over the plan period. A map showing the location around the town of higher level stewardship schemes and the key environments with woodland grants is available on request at the Town Hall. The main areas are to the south and south west of Attleborough, and are effectively connected so they can form a bio-diverse corridor.

9.7 The town is within the impact zones for the two SSSIs. However, although the proposed Employment Site allocation is the closest ANP intervention to these SSSIs, the distances are still relatively far at 0.5 km from Swangey Fen, and 1 km from Old Buckenham Fen.

Character Assessment: landscape

9.8 Attleborough is in the national landscape typology of South Norfolk and High Suffolk Claylands, with two sub-divisions both covering part of the ANP area: Intermediate Clayland, wooded (estateland) and Intermediate Clayland wooded (Ancient Wood) curving around the south and west of the town. In the Natural Area of the East Anglian Plain, The Norfolk Biodiversity Partnership has prepared an indicative Ecological Network Map of Norfolk. Within this Ecological Network Map Attleborough’s ANP area is part urban and part heathland, grassland and woodland enhancement areas. The *Brecklands District Character Assessment* (May 2007) Land Use Consultants, sets out broad landscape character and establishes that the land to the south of the rail line is of less quality than that to the north

of the A11, suggesting the SUE is correctly located in landscape terms. The landscape character areas are The Buckenhams Tributary Farmland (B2), the River Thet (A1) and the River Thet Tributary Farmland (B3) and at the edge is near to some of Old Buckenham Plateau (E3). The landscape has a tranquil, rural quality, although the A11 is visually discordant. Pedestrian access to the river is restricted. Restoration and enhancement of ecological habitats is a potentially positive future opportunity (*Brecklands District Character Assessment* (May 2007) Land Use Consultants para B2.14).” In terms of urban design, the report suggests that for this area: “Ensure that new development within the settlements reflects the use of local materials, and that settlements individual and separate identities are preserved through avoiding coalescence”.

9.9 To the north of the town and A11, the Thet Settled Tributary Farmland forms a narrow band of gently undulating farmland intersected by tributaries draining southwards into the River Thet. The majority of the character area is defined by the Norfolk Biodiversity Mapping Project as being a core area due to the “distribution and variety of high quality extant habitats and wetland environments including rivers and streams and reedbeds”. The settlement character is “small, generally linear villages and isolated hamlets scattered along the rural road network. Buildings display a range of vernacular materials, including dressed stone, red brick, clay tile and colour washed render” (*Brecklands District Character Assessment* (May 2007) Land Use Consultants para B3.8). Objectives outlined in the report include: “Explore opportunities to improve biodiversity through creation of field set aside margins and pastoral buffers to the tributary watercourses”; and “Conserve historic green lanes that cross the area”. In terms of urban design it has the following considerations on page 131: “Ensure that new development reflects the existing material and stylistic vernacular within the settlements and that their individual and separate identities are preserved. Monitor development and boundary treatments to the settlement edges, resisting any materials and/or species which could have an urbanising influence on the rural landscape”. **In terms of any development within the ANP boundary lying outside of the town and SUE boundaries, the ANP will expect BC to follow these report recommendations in their planning committee deliberations.** The document can be viewed at <https://www.breckland.gov.uk/article/2455/Documents-Library-Publications> scroll down to environment.

Character Assessment: Urban

9.10 In order to provide a more local and townscape oriented character assessment, work for this Theme was undertaken by the Attleborough Heritage Group (AHG) and set out in *Attleborough Neighbourhood Plan Character Assessment* (November 2015), which forms an important part of the ANP Evidence Base. The town has a large number of listed buildings and there are also many in the wider area within and near to the ANP designated area. They are set out in full in the *Attleborough Neighbourhood Plan Character Assessment* (November 2015, Attleborough Heritage Group, together with lists of important non-listed buildings both in the Conservation Area and in the wider ANP boundary or sufficiently near the boundary to

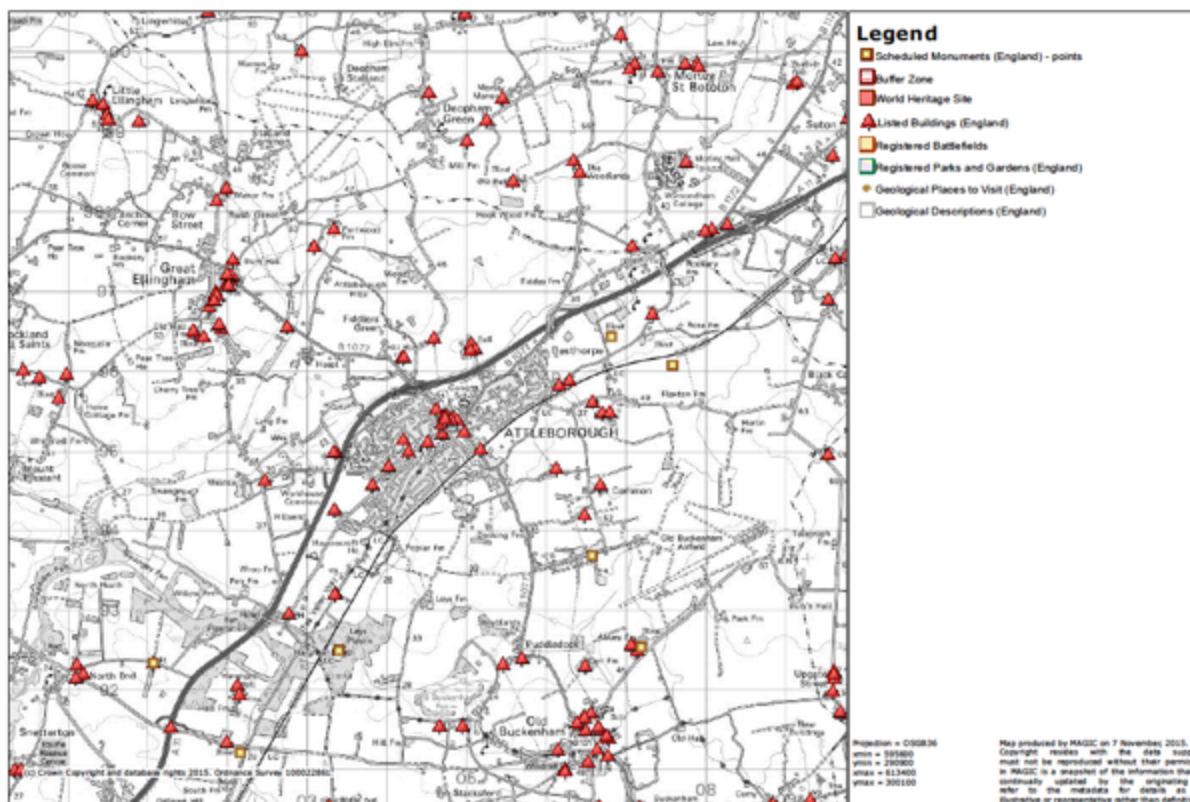
be of significance because of their setting. The town centre has a Conservation Area covering the majority of the historic central core, including the main shopping area, church and high street. The document is available on the web site and in the Library and Town Hall. Whilst there are District-wide policies for the Listed Buildings and Conservation Areas, the ANP has used this evidence to form the basis for requiring policies ESD P5 and ESD P6, both of which follow policy in the NPPF paragraph 58: “Local and Neighbourhood Plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.”

The adjoining borough South Norfolk has design policies in its Core Strategy - Joint Core Strategy for Broadland, Norwich and South Norfolk Adopted March 2011, amendments adopted January 2014. Policy 2 is about good design. Note also there are references to the importance economically of the A11 corridor. Page 34 gives the Area wide Green Infrastructure spatial plan on which Attleborough appears with two sub regional corridors: no 3 and no 4, both linking back as far as Norwich.

https://www.south-norfolk.gov.uk/sites/default/files/JCS_Adopted_Version_Jan_2014.pdf

MAGIC

Attleborough Listed Buildings Map 3



Waste Water, floods and SUDS: Water Cycle Strategy

9.11 The BC Breckland Water Cycle Phase 2 Detailed Study Non Technical Summary states there is sufficient water supply, though developers would be responsible for connections to houses. However wastewater, generated within Attleborough and currently treated at Attleborough Waste water Treatment Works (WwTW), does not currently have adequate capacity to accept and treat any additional wastewater generated. “A number of solutions have been considered by the Wastewater Working Group and the preferred solution is to continue to treat all wastewater from the new development at Attleborough WwTW but move the discharge location for the works to a new discharge point on the River Thet downstream of Buckingham Stream.” The document continues that development beyond approximately 1,500 properties will require a new main sewer to be constructed, or for the existing sewer to the west of Attleborough to be upgraded to facilitate the transfer of wastewater from the development areas to the WwTW. An indicative route for the main and associated sewage pumping station is provided, reproduced at BC Breckland Water Cycle Phase 2 Detailed Study Non-Technical Summary alongside paras 4.1.6 – 4.1.10.

9.12 BC states in the *Breckland Water Cycle Phase 2 Detailed Study Non-Technical Summary* para 4.1.12: “The development sites will require the installation of SuDS prior to the commencement of occupation of development and it is recommended that these are constructed prior to main site construction to provide water quality benefits for sediment reduction during site preparation. Due to the large preferred option site areas, there is potential to use many different SuDS techniques from source control on individual housing blocks to regional control via wet ponds or retention basins. There are various small watercourses at the site for potential connection however; the East Harling Internal Drainage Board (EHIDB) would need to be consulted (BC *Breckland Water Cycle Phase 2 Detailed Study Non-Technical Summary* para 4.1.13). The capacity to infiltrate surface water to ground is reasonably high, and hence infiltration techniques should be encouraged (after a pollution risk assessment has been completed) to manage surface water runoff. Surface water management schemes for the sites should be reviewed at a strategic site level to ensure the overall sustainability of the management techniques and maximum the opportunities for wider environmental benefits such as blue corridors and linked wetland systems.” These statements are considered to be part of the policy background for the ANP objective ESD 4 and the QB will expect development control planners in the BC to impose and monitor the relevant conditions to ensure these SUDS recommendations are followed. The document can be found at: <https://www.breckland.gov.uk/article/2455/Documents-Library-Publications>, and scroll down to the section headed water.

Core Connections 25 September 2016, updated 12 March 2017

For Attleborough Town Council

Reference documents online

Document Links

There are a large number of documents that are referred to in the ANP and its reports, where a web link is provided. However a link here goes to those of particular relevance.

- **Breckland Council** evidence is available on their website Documents Library
 - i. Core Strategy

- ii. Local Plan (emerging) Local Plan Preferred Sites and Settlement Boundaries

Attleborough is described here:

http://consult.breckland.gov.uk/portal/planningpolicy/local_plan_preferred_sites_and_settlement_boundary/interim_consultation?pointId=s1453207161772#section-s1453207161772

- iii. Evidence Documents on Breckland web site

1. **Employment & Retail**

- a. *Employment Growth Study and Land Review 2013*

2. **Environment**

- a. *Open Space Assessment and Open Space Parish Schedule 2015 (A-C) Attleborough.*

- b. *Brecklands District Character Assessment (May 2007) Land Use Consultants*

3. **Transport –**

- a. All the Attleborough Town Centre and Link Road studies listed

4. **Community Infrastructure Levy CIL Revenue and Gap Funding**

5. **Water Cycle BC Breckland Water Cycle Phase 2 Detailed Study Non-Technical Summary**

The most practical way to access these documents is scan down on the web site below to evidence base and background documents at:

<http://www.breckland.gov.uk/article/4313/Documents-Library-Publications>

- **Norfolk County Council** documents on education and on highways have been referenced in the Consultation Statement.

Also used is Evidence Base on S106 contributions for services NCC provides such as education and social care in *Planning Obligations Standards* April 2016

<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/planning-obligations>

Regional Documents

As there is no longer a regional tier to local government we cannot look to current regional strategic documents for support, but they are still useful as evidence. While these documents are no longer policy, they give valuable background and evidence to support our ANP policies on health and well-being, leisure and informal recreation, and stimulating nature play, biodiversity, tree planting and public access to green infrastructure. The parts in italics are directly relevant as part of the background to help support the ANP environmental, sport and health & social care policies in particular, as well as supporting a high quality of design on the new development fringing the current town boundary.

- *Norfolk Rural Development Strategy* (September 2013)

Regional Green Infrastructure Policy - Evidence

- *Regional Planning Guidance 6: Regional Planning Guidance for East Anglia to 2016*

Regional Planning Guidance 6 (RPG6) provides advice on how Local Authorities should address the adoption of strategies aimed at ensuring that all development is sustainable with regard to the countryside and biodiversity. The advice set out within RPG6 echoes that of central government.

- *The draft East of England Plan, A Regional Spatial Strategy for the East of England, EERA, 2004*

The East of England Plan was prepared to give the regional planning guidance to 2021 and beyond. The key policy relevant to Green Infrastructure within the East of England Plan is ENV1: Environmental infrastructure, which is as follows:

“Environmental infrastructure will be identified, developed and implemented in the region to ensure that a healthy and enhanced environment is provided for the benefit of present and future communities and to contribute to economic objectives. Local Development Documents will:

- Provide connected and substantial networks of accessible, multi functional green space, in urban, urban fringe and adjacent countryside areas to service new communities in the Sub Region by 2021
- Have a *multiple hierarchy for provision of Green Infrastructure*, in terms of location, function, size and levels of use, at every spatial scale and all geographic areas of the region

- Provide and safeguard Green Infrastructure based on the analysis of existing natural, historic, cultural and landscape assets, provided by characterisation assessments and the *identification of new assets required to deliver Green Infrastructure*
- Identify biodiversity conservation areas and biodiversity enhancement areas, to deliver large-scale habitat enhancement for the benefit of wildlife and people
- Set *targets for the provision of natural green space within development areas.*”

- *Our Environment, Our Future: The regional environment strategy for the East of England, EERA and EEEF, 2003*

The Regional Environment Strategy provided a summary of the current state of the environment in the East of England, described the main environmental challenges facing the region and provided a series of strategic aims for responding to these challenges.

- *A shared vision: The regional economic strategy for the East of England, EERA and EEDA, 2004*

The Regional Economic Strategy set the long-term vision for sustainable economic development in the East of England. The relevant goal is to provide high quality places to live, work and visit. *A key priority within this goal is to develop and enhance green spaces and infrastructure to support economic growth.* The key actions identified to achieve this priority include the following:

- development and management of green networks of infrastructure for the region
 - investment in and enhancement of key environmental assets
 - development of *a high quality and accessible urban-rural fringe*
- *The Regional Social Strategy: A strategy to achieve a fair and inclusive society in the East of England, EERA, CLG and EEDA, 2004*

The Regional Social Strategy sets out a vision, objectives and actions to achieve a fair and inclusive society for the East of England. A key objective presented is SO6: To support the development of sustainable communities. *The strategy highlights the strong links between proximity to nature and social wellbeing.*

Action Point 3 of the strategy is as follows:

*“To directly promote the development of strategic networks of green space that benefit physical and mental well being, particularly in areas of deprivation, by **providing for more contact with nature for all** across the Sustainable Communities Plan growth areas”.*

- *Woodland for life: The regional woodland strategy for the East of England, EERA and the Forestry Commission, 2003*

The regional woodland strategy sets out a vision and a series of action plans to enable trees and woodlands to deliver high quality and sustainable benefits within the region.

The strategy considers the advantages that trees can bring to the urban fringe and the built environment, stating that *trees and woodlands in and around the built environment can contribute towards creating places where people want to live and work and help to define the cultural identity of urban areas.*

National Sport and Informal Recreation and Play Standards

Online links to documents:

- Inclusive Design for Getting Outdoors (I'DGO) www.idgo.ac.uk/
- English Nature *Accessible Natural Green Space Standard* (ANGST) publications.naturalengland.org.uk/file/4978379893768192
- *Beyond the Six Acre Standard* 2015 Planning Guidance for Outdoor Sport and Play produced by The Fields In Trust (FIT) www.fieldsintrust.org/guidance
- Sport England Facilities Planning Model (FPM) and Sport England Facility Planning Calculator (FPC) <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>
- Chief Medical Officer Department of Health (2004) *At Least Five a Week: Evidence on the impact of physical activity and its relationship to health.* www.bhfactive.org.uk/sites/Exercise-Referral.../cmos-report-at-least-five-a-week.pdf
- Centre for Transport Studies (2004) *Making Children's Lives More Active* University College London) discovery.ucl.ac.uk/1346/1/2004_39.pdf
- *Planning for Play* Play England National Children's Bureau / Big Lottery Fund, (March 2006) http://playengland.org.uk/media/120480/planning_for_play.pdf
- *Growing In The Community* (2nd Edition) guidelines as produced by the LGA, it is available to download at http://www.local.gov.uk/publications/-/journal_content/56/10180/4045787/PUBLICATION
- *Trees in the Townscape A Guide for Decision-Makers* Trees & Design Action Group Issue 2 (December 2012), available to download from <http://www.tdag.org.uk/trees-in-the-townscape.html>.

Adjoining Boroughs

- *Greater Norwich Indoor Sports Facilities Strategy* for Broadland District, City of Norwich Council and South Norfolk District Final Report (October 2014). http://www.south-norfolk.gov.uk/planning/media/G8_Greater_Norwich_Indoor_Sports_Strategy_Oct_2014.pdf
- *The Greater Norwich Green Infrastructure Strategy: a Proposed Vision for connecting people places and Nature* GNDP / Chris Blandford Associates (November 2007). www.greaternorwichgrowth.org.uk/dmsdocument/109