
From: Antony Needham <t.needham@derehamtowncouncil.org>
Sent: 08 February 2018 13:14
To: Programme Officer
Subject: RE: Examination of the Breckland District Local Plan (2011 - 2036) (the Plan)
Attachments: Local Plan additional issues and matters.pdf

Dear Charlotte,

I would like to present the attached comment which it is felt constitutes a significant omission from the Matters and Issues list and should be given further consideration as part of the Local Plan Examination.

Please get back to me if anything is unclear.

Best wishes

Tony Needham
Dereham Town Council

Dereham Town Council

Examination of the Breckland District Local Plan (2011 – 2036)

Significant Omissions - Matters and Issues.

Congestion in Dereham and the Dereham Transport Study

The Matter relates to the level of congestion in Dereham. The impact the planned growth will have on congestion, the evidence produced and the deliverability of the options to mitigate the projected traffic growth.

Congestion is one of the major concerns for residents, the robustness of the evidence base for this issue should be probed. The Town Council has raised concerns with the Transport Study and Congestion at every opportunity.

It is well recognised that Dereham has problems with congestion, Breckland Council state that *“due to existing issues regarding congestion it is important that any future growth is planned with the necessary mitigation measures and improvements to the transport network to ensure existing issues are not exacerbated by new developments”*¹

In order that future growth is planned the evidence to support the proposed growth is derived from the Dereham Transport Study conducted by WYG in 2015 (the Study). While the scope of the Study was agreed with the Highways Authority, the Highway Authority are not infallible and can make mistakes.

Issues with the Study.

Issues relating to the soundness of the evidence and whether sound science is being used responsibly.

Forecast Traffic Distribution (paragraph 5.5 of the Study).

The Forecast Traffic distribution is based on the 2011 journey to work data. Applying this data to the distribution of traffic at peak times in Dereham is wrong because the morning peak traffic times is between 08:15 and 09:15. People who travel to work will already have left, the peak time in Dereham does not relate to travel to work traffic in the sense of the 2011 census. Dereham Town Council has conducted its own traffic surveys using ANPR technology and derived a very different distribution pattern, which can be explained by people who travel some distance to work leaving before the peak; the peak relates to school traffic, people coming into Dereham to work and people moving around Dereham.

Congestion in Dereham is also a problem on a Saturday morning, the Study did not initially carry out surveys on a Saturday. Subsequent surveys carried on a Saturday were not modelled. The issue being for a Saturday is that far more traffic would be retained on the network in Dereham rather than be distributed to leave Dereham, as modelled in the Study. This is important because although Saturday has a single peak, it is spread over a longer period. It is also the day when most trade is being carried out. Not fully understanding Saturday congestion could result in trade being diverted away from Dereham.

¹ Infrastructure Deliver Plan 2017.

If the initial assumptions on distribution are flawed and no modelling of the junctions was carried out on Saturdays; the whole Study could be flawed. If the study is needed to identify mitigation, then it should be of the highest quality, not based on flawed assumptions and limited modelling.

Other issues.

Paragraph 2.62 of the Infrastructure Delivery Plan states that the Study shows how development is likely to affect the transport network.

This is not correct, the Study only looked at a number of junctions in isolation, it did not look at the network as a whole. There is therefore no understanding of the impact of increasing junction capacity at specific junctions will have on the wider network. This is important because of the level of queuing; junctions interact with each other, changing one aspect of the network could impact other junctions. There is also no understanding the impact of developments to the South of Dereham will have on the Fen Road A47 junction. Studies carried out by Dereham Town Council indicate that developments to the south of Dereham could impact on this A47 junction.

Paragraph 2.63 of the Infrastructure Delivery Plan states that the Study tested and modelled the junctions up to 2036. Yet in paragraph 10.7.2 of the Study it is stated that *“Potential mitigation measures were developed that could be introduced at these junctions. These would provide the additional capacity to mitigate the effects of the development traffic plus the forecast background traffic up to year 2026”*. If the proposed mitigation is only modelled up to 2026 then it does not cover the Plan period.

As detailed in paragraph 10.7.6 of the Study, both option 1 and 2 of Junction 1 (table 4¹) would be required to 2026. Option 1 has already largely been delivered through NPIF funding via Norfolk County Council. Option 2 is a signalised roundabout and would be required up to 2026. It has not been proposed that any funding for the signalised roundabout comes from developer contributions, it would therefore need funding from other sources. The budget for Option 2, detailed in table 4¹ is £1,716,500 excluding land purchase. While this funding would not be needed for a number of years, there is no commitment from Norfolk County Council to deliver the scheme nor is it included in the Norfolk Strategic Framework which does include projects up to 2025. To be a viable Plan the Infrastructure Delivery Plan should demonstrate a clear commitment from Norfolk County Council to deliver the highway improvements detailed in the Study.

Sustainable Transport (chapter 4 of the NPPF)

Paragraph 12.2.6 and 12.4.2 of the Study states that if large scale developments were allocated, the provision of new or improved pedestrian and cycle links would ensure that that the sites were accessible by non-car modes, with the result that the pressure on the highway network would be reduced. No origin destination analysis has been carried out for the development sites to understand what improved cycling links would be required. Nor have these been required as part of any transport assessment. The proposed mitigation detailed within the Study made no allowance for cyclists, this is a serious omission.

Paragraph 29 of the NPPF clearly states that *“the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel”*. The level of congestion and volume of traffic at key junctions and large sections of the town is such that areas are effectively cut off for all but the most confident cyclists. Without a proper origin – destination analysis of each development site for less confident cyclists, there is no understanding of what is required to make each development sustainable or comply with paragraph 29 of the NPPF. If a transport study was required as part of the evidence base for the Local Plan then to be compliant with the NPPF any transport study should have included an equally comprehensive walking and cycling study.

Policy ENV 04 New Provision of outdoor playing space.

There are issues that have arisen recently that have not been raised before but which need clarifying in order for ENV04 to be effective.

- 1) There is no clear definition of what “an outdoor area for sport” is. To avoid confusion “area for sport” should either be changed to Playing field (as Playing Field is defined in the NPPF) or the definition defined within the glossary. The Definition should align with the NPPF definition.
- 2) Clarity of wording for new provision.
The first line of ENV04 states that *“All new residential development is expected to provide a contribution towards outdoor playing space equivalent to 2.56 hectares per 1000 population”*.

This statement then seems to be contradicted by the third paragraph which suggests that for developments of less than 200 dwellings, children’s play areas only need to be provided at a rate of 0.8ha per 1000 population. There needs to be absolute clarity that the overall provision is 2.56 hectares per 1000 population even if only LAPs and LEAPs are provided.

Given that the NPPF has a definition for “Playing Field” as an area containing a sports pitch and of a minimum size of 2000m², ENV 04 would better accord with the NPPF if “an area for sport” (playing field) is required for all development of more than 50 dwellings.

- 3) Developers are starting to use elements of the Surface Water Drainage (SUDs) schemes as part of their contribution to outdoor playing space. These attenuation features / outdoor playing space can receive water for different rainfall events. A SUDs that receives water only in 1 in 100 year rainfall event would probably be acceptable as serving a dual purpose as children’s play as part of a SUDs scheme. However a SUDs area that receives water on a 1 in 1 year rainfall event is unlikely to be acceptable as a children’s play area. There needs to be some clarity of what is deemed unacceptable for both communities and developers so that plans can come forward with the minimum uncertainty and objection.

If areas are going to serve a dual purpose of both outdoor play space and SUDs, there needs to be measures put in place within the 106 agreement to ensure that these areas are maintained as outdoor play spaces to a particular standard. There is a danger with areas serving a dual purpose, that the drainage function will take priority. If additional water storage is required in the future because of conservatories and extensions being built which add additional flows, the play areas could be lost to drainage.

Without a mechanism to secure the quality and quantity of outdoor playing space they should not serve a dual function as part of a SUDs scheme. Otherwise they could be lost in the future.

The issue of the dual use of outdoor playing space and SUDs features and the long term protection of outdoor playing space within such arrangements needs to be referenced within the policy.