

Examination Breckland District Local Plan 2011-2016)

Written Statement Issues and Matters.

Dereham Town Council

The Town Council would like to participate at the Hearing on this Matter.

Matter 14 Housing Allocations

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 and 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 this study was agreed with the Highways Authority, the Highway Authority are not infallible and can make mistakes as will be demonstrated below.

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 from the Census. The actual peak time in Dereham is 8:15 to 9:15. Applying the Forecast Traffic Distribution to the Dereham peak time is flawed, because many people who travel to work will already have left. 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 time; 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 Saturday mornings, but the Study did not initially carry out surveys on a Saturday. Subsequent surveys carried on a Saturday were not modelled. The issue is that for a Saturday, 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

¹ Infrastructure Deliver Plan 2017.

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 and affect sustainability.

As the initial assumptions on distribution are flawed and no modelling 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.

Other Transport 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 that 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 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 the year 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 by 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. 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 Local Plan, the Infrastructure Delivery Plan should demonstrate a clear commitment from Norfolk County Council to deliver the highway improvements detailed in the Study. Given that it is proposed that Dereham will deliver its planned allocation of housing in the early phase of the Plan, it is surprising that the signalised roundabout required in the study does not feature in any authority's strategic infrastructure plan.

Because the funding for the mitigation (signalised roundabout) for the Plan has not been identified, the housing allocation for Dereham should be considered unsound.

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 the sites were accessible by non-car modes, with the result that the resultant 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 (particularly less confident cyclists). **This is a serious omission and the Plan should be considered unsound until this work has been carried out or until it is a requirement for new developments to carry such a detailed analysis.**

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. **The Plan should be considered unsound until this work has been carried out or until it is a requirement for new development to carry such a detailed analysis**

For All Dereham Allocations

To avoid confusion, rather than being individually detailed, reference to Outdoor Playing Space for each site should read:

Outdoor Playing Space must be provided in accordance with ENV 04.

Housing Allocation 2

This site is poorly connected to the town centre, being nearly 2km away. The site would be highly reliant on private car usage. If the site is to be allocated, the policy should clearly show how the site can be made sustainable by demonstrating that there is a safe and convenient cycle route for less confident cyclists to the town centre and both high schools so that it meets the requirement of policy TR01.

If the site is included for housing development then alternative provision for employment should be allocated so that there is no net reduction in employment land.

Housing Allocation 3

This site is at the junction between the Central and Easter Green Corridors as identified the Dereham Green Infrastructure study 2008. There needs to be some reference to these corridors and a requirement that the developer designs the site to take these matters into consideration so that the integrity of the ecological network can be maintained and improved, in order to deliver net gains in biodiversity.

If the site is to be allocated, it should clearly show how the site can be made sustainable by demonstrating that there is a safe and convenient cycle route for less confident cyclists to the town centre and both high schools so that it meets the requirement of policy TR01.

Housing Allocation 4

This site is located adjacent to the Central Green Corridor as identified the Dereham Green Infrastructure study 2008. There needs to be some reference to these corridors and a requirement

that the developer designs the site to take these matters into consideration so that the integrity of the ecological network can be maintained and improved, in order to deliver net gains in biodiversity.

If the site is to be allocated, it should clearly show how the site can be made sustainable by demonstrating that there is a safe and convenient cycle route for less confident cyclists to the town centre and both high schools so that it meets the requirement of policy TR01.

Housing Allocation 5

The LPA has not demonstrated that the chosen approach is the most appropriate given the alternatives.

The site's connectivity with the town centre, in terms of sustainable transport, has not been fully considered. Impact of development in this location is not adequately understood.

A proper link road should be provided between Shipdham Road and Yaxham Road incorporating a twin carriageway road bridge over the railway. NCC own land on the eastern side of the existing bridge on the Southside of Westfield Lane which would accommodate a wider bridge and approach.

This site is adjacent to the Southern and Central Green Corridors as identified in the Dereham Green Infrastructure strategy. Greater emphasis therefore should be placed on providing net gains in biodiversity.

If the site is to be allocated, it should clearly show how the site can be made sustainable by demonstrating that there is a safe and convenient cycle route for less confident cyclists to the town centre and both high schools so that it meets the requirement of policy TR01.

Insufficient consideration has been given to the alternative site to the east of Yaxham Road. This site has potential to deliver housing earlier in the plan period because there is an existing detailed application pending and the developer would be willing to make land available for a future link road.