

# DEREHAM TOWN COUNCIL

25<sup>th</sup> April 2023

At an **Extraordinary Meeting** of the **Full Council** held on **Tuesday 25<sup>th</sup> April 2023** in the Memorial Hall at **7.30pm**.

**Present:** Councillors H King (Chairman), K Cogman, P Duigan, A Greenwood, L Monument and P Morton.

Also in attendance: Town Clerk Tony Needham and Deputy Town Clerk Jillian Barron.

**123. To consider apologies for absence.**

Apologies for absence were received from Councillors A Brooks, C Bunting, H Clarke, H Jones-Seymour and T Monument.

**124. Declaration of Interest.**

There were no declarations of interest..

**125. To comment on Breckland Councils Local Plan Issues and Options**

**Comments.**

**Has the Issues and Options Report identified all those planning challenges and opportunities which the Local Plan should be addressing?**

**Summary:**

The Council felt that the overall vision was not sufficiently ambitious with regards to sustainability and the challenge of transitioning to a zero-carbon future. There were some specific planning challenges and opportunities, which the Council felt had not been identified in the Issues and Options report and are detailed below.

**Comments.**

**Congestion in Dereham and possibly other Market Towns:**

As part of the current Local Plan a transport study was carried out for Tavern Lane and surrounding junctions. This study identified a number of improvements needed in order to accommodate the growth in traffic. Once the Local Plan was approved, Norfolk County Council stated that the major interventions identified in the Transport Study were undeliverable.

If a transport study was needed for the current Local Plan, but the interventions were deemed undeliverable, the Council felt that, if a transport study was a requirement for the current Local Plan, then a revised transport study would be required for this Local Plan, to this time identify highway improvements which are actually deliverable.

Traffic congestion is often raised as a concern for residents and it is due to the volumes

of traffic that most roads and junctions are hostile to cyclists, discouraging all but the most confident cyclists. In addition measures taken to improve traffic flow, such as flared junctions and pelican crossings often reduce the attractiveness of a route for walkers.

Dereham Town Council feels that the congestion in Dereham has not improved and feels that it is imperative that congestion in Dereham be included as a planning challenge to be considered in detail in the Local Plan review in order for it to meet the requirements of paragraph 104 of the NPPF.

The NPPF. States that [emphasis added] :

**104 Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:**

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) **opportunities to promote walking, cycling and public transport use are identified and pursued;**
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

**105. The planning system should actively manage patterns of growth in support of these objectives.** Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and **offering a genuine choice of transport modes.** This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making. 106. Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, **to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;**
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- d) **provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans**

The Town Council does not believe that the Issues and Options Report has sufficiently taken account of paragraphs 104 and 105 of the NPPF, particularly with regards to the opportunities and challenges of making active-travel a genuine choice of transport mode.

### **3.0 Vision and Objectives:**

The Town Council feels that Sustainability is very important and should be strong a theme running through the document.

The Town Council felt that the most sustainable pattern of development would be one where everybody's daily needs of employment, healthcare, shopping, socializing etc. could be secured within a reasonable walking distance. Such a pattern has the added economic benefit that the cost of providing services will be less also and require less energy. If people spend less on transport costs, then they have more money to spend in the local economy resulting in an economic benefit.

The least sustainable form of development would be to place all development in rural areas where people need to travel further for work and services and where services cost more to deliver. It is well recognized (and self-evident) that communities and industries that are currently most reliant of fossil fuels will be the same communities most challenged by the move to a zero carbon economy. Patterns of development which continue to make people heavily reliant on energy will create future challenges rather than easing the transition to a zero carbon future.

It is worth noting that, even when all vehicles have been switched to electric and all the electricity supply is from a low carbon source, there will still be carbon emissions associated with vehicles.

One source suggests that the carbon emissions from an electric car and a decarbonized energy grid would still be 46g per km. With the average car covering around 7,000 miles a year, each household having two cars and using a 'back of an envelope' calculations; one tree would need to be planted every year for each household to remove the carbon associated with day to day travel, even with an electric car and decarbonized electricity supply.

The Council feels that all development should be focused in the urban areas as this provides the most sustainable form of development. This will still be the most sustainable form even when all the cars are electric and all the power supply is zero carbon.

If Breckland Council are considering patterns of development which are not focused on the urban areas, then there really needs to be some measure to compare energy usage for different forms of development, so that an informed decision can be made on the alternative options.

#### **Second paragraph of the Vision.**

*“new development will be directed to locations that are coordinated with transport provision, have good access to support existing services, community facilities and open space.”*

The Council feels that this is not sufficiently ambitious if zero-carbon and sustainability is a key driver. The term “transport provision” could just mean a road! Even if this was meant to say public transport provision, public transport can be very variable; 3 buses an hour is a good service, 2 buses a day is not a good service and would not serve most people's day to day needs if it were their only access to services. While public transport produces fewer emissions than single occupancy cars, this is only true when the buses are well used. Buses are not zero-carbon, walking and cycling are as close to

zero-carbon as you are likely to get. Focusing development around public transport hubs such as train stations and bus interchanges where there are multiple public transport options, is probably sustainable because it reduces the need to own a car. 1/3 of all the energy used by cars comes from the manufacturing rather than the driving.

**A more ambitious Vision could read:**

*“New developments will be directed to the most sustainable locations where car journeys can be minimized and where most day to day services can be reasonably accessed on foot. Where other services are located further than a reasonable walking distance, then cycle provision to other service must be provided. All new developments will have a bus service of frequency of greater than one bus an hour to a town or city centre”.*

**Fourth paragraph.**

“Services and facilities will be supported and prized in rural villages” – services and facilities are vital in the towns as well as the villages! This should read, all services and facilities will be supported and prized.

**Fifth paragraph.**

If important characteristics are to be retained, then at some point there needs to be an assessment of what these important characteristics are.

**The Climate Emergency must be better reflected in the Vision.**

Such a vision could be: *‘Breckland will aim to have a balanced energy requirement, it will aim to generate as much renewable energy as it consumes. It will achieve this by reducing energy usage through directing development to locations where travel is minimized, ensuring the highest levels of insulation, solar-gain and renewable energy generation on every new property’.*

**The Local Plan should be more positive with regards to large scale renewable energy generation.**

The Ukraine war has demonstrated the value of energy and the Government is talking about amending the NPPF to encourage more onshore wind power. Onshore wind is the cheapest form of renewable energy. If the Government is looking to encourage more onshore wind then Breckland should be ready for this change and develop its own vision for onshore wind and photovoltaics in Breckland. Such a vision could be delivered through the production of a map showing areas where wind turbines would have the least impact and have the greatest benefit. Breckland Council produced such a study in 2003. This report should be revised so that the Local Plan can be more positive regarding onshore wind and PVs.

**The Vision should be more positive towards biodiversity and helping nature adapt to climate change.**

The current Local Plan identifies broad strategic green corridors, but does not recognize local green corridors other than those identified in Neighbourhood Plans. Areas that are going to see the greatest level of growth, should also have a Local Green Infrastructure plan as part of the Local Plan to ensure that development does not impact on the Local Green Infrastructure and importantly, the connectivity between wildlife sites. If enhancing biodiversity is important then detailed green infrastructure plans for each location which will see growth, should be included in the Local Plan rather than being left to the chance of a settlement producing a neighbourhood plan. Identifying local green corridors to be protected and enhanced along with areas where new green corridors would be beneficial; is a very inexpensive process.

The provision of nesting sites should be a requirement for the design of every new property, e.g. bat bricks, swift bricks and the like.

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**Number 3.** Could probably do with being a bit more specific. Say within a 15 minute walk of most day to day services and to be able to be able cycle to other services.

**Number 5.** 'within or adjacent to the market towns' - this could literally be anywhere. This should be more detailed and specific e.g. 'housing delivery will be located within or adjacent to the market towns, at the most sustainable locations where the most services can be accessed on foot and where cycling to other services can be made a genuine choice for most people'.

**Number 7.** Only 'encouraging' high quality and safe design! Dereham Town Council feels this could be more aspirational e.g. 'requiring high quality sustainable design, providing safe spaces and places'.

The Council felt that it would be a good idea to identify aspects of poor design, examples noted by Councillors were:

- Garages too small for cars to open doors.
- Garages with no power supply
- Large number of houses served by shared use streets with no identified space for pedestrians.

**Number 11** - The aim to 'promote the vitality and viability of the town centres' - could mean anything, is very generalized and means whatever anybody wants it to mean! This could be more specific e.g.

'promote the vitality and viability of the town centres, support the retention of existing services and retaining (or increasing) the current level of commercial floor space within the town centres'.

The Town Council is not fixed on rigidly retaining retail within the Town Centre, it is happy to see alternative commercial use, but would like to see policies that strongly resist the loss of retail/commercial space to residential.

The Town Council feels that the existing bus infrastructure in the Town Centre has reached capacity. Any further growth in the Town and hinterland is likely to bring additional pressures to the level of bus movements in the Town Centre.

The Issues and Options needs to identify the planning challenges associated with increased bus use and the need for additional infrastructure in Dereham town centre.

### Page 14.

**Number 12** – Why especially in rural areas? These things need to be balanced with how much effort is placed on ensuring a few rural properties are serviced, when for the same cost, a much larger number of properties in a town could have their internet speed increased.

It would be better if it read "Provide for improved broadband connections, including in rural areas where this is economic to do so".

**Number 17-** Health is most effectively promoted by making active travel part of

everyday travel. The health and economic benefits of active travel are well recognized and known as the [Health Dividend](#).

To improve health and wellbeing, development sites will be selected and assessed on the basis of which site would produce the most active travel patterns. This would ensure that new development is located on sites which are most likely to have the greatest impact on promoting health.

**Question 2 – the Objectives are not as relevant as they could be, the urgency regarding the climate crisis has increased significantly since the priorities were originally set.**

#### **Page 17**

##### **Settlement Hierarchy.**

This section deals with how much development sustainability will be compromised with developments out of the towns. The most sustainable pattern of development would be to place all development in the towns with all services required on a daily basis within reasonable walking distance.

The Town Council feels that, development in the service centres and rural areas is not as sustainable as focusing all the development in the market towns. Provided it can be planned correctly, focusing housing, employment and services in the market town would be the best way to address the challenges of climate change.

##### **Paragraph 4.9**

“access to public transport with a frequency of service” – how frequent does a service need to be to be useful. Weekly? Daily? Hourly? Early morning and late evening so work can be accessed? There needs to be a bit more detail. The Town Council feels that for a bus service to be of service and a realistic alternative to a car, then frequency needs to be 7 days a week and sufficient for people who may work shift patterns.

**Question 4 –** No. A more sustainable form of development would be to direct growth to the towns, provided this growth is planned correctly.

**Question 5-** A more sustainable form of development would be to direct growth to the towns, provided this growth is planned correctly.

**Question 7 –** ‘Access to public transport with a frequency of service’. It is all dependant on the frequency. A bus once a year at Christmas has a frequency, but it doesn’t improve accessibility to services. Rather than say access to public transport this should say ‘access to a public transport hub’.

**Question 9 –** would this be more environmentally sustainable than locating services within the Market Towns?

#### **Page 21 - 4.24**

While Dereham Town Council recognises and is supportive of the outcomes which a 15 minute neighbourhood is trying to achieve, it feels the concept may not directly transpose into the rural district. While the 15 minute neighbourhood template may work very well in an urban setting with an extensive and sophisticated public transport system, supported by a comprehensive cycling network, it is felt that something different is needed in Breckland to deliver similar outcomes.

The Town Council is very supportive of policies which reduce the need for anything other than active travel. The Town Council would like to see the same intended outcomes as a 15 minute neighbourhood but delivered in a way which is tailored for market towns rather than large conurbations.

## Page 22

### Question 10.

Most important options are:

- 1) Number 2
- 2) Number 4 – but probably would be better if it stated active travel and leave out public transport as it is dealt with under option 12.
- 3) Number 12 – probably should say transport hubs or be clear what a good transport link is.

## Page 33 – the Economy.

Breckland has the lowest concentration of jobs as a proportion of the working age population of any district in Norfolk. The only land currently allocated for employment in the local plan, in Dereham, is subject to a ransom strip. Other land previously allocated for employment (land to the rear of Westfield Road) has been lost to housing along with the former Crane's offices at South green. Land currently being used for employment at Toftwood nurseries has been allocated for housing and sites such as the former Jewsons and Palgrave site at Westfield Road are unlikely to return as employment sites. There has also been a gradual removal of retail space in and around the Town Centre.

One of the reasons Breckland needed to review the Local Plan was because the proposed Local Plan had not fully considered the opportunities and impact fully dualling the A47 to Norwich would have on economic development within Dereham.

The Issues and Options consultation devotes nearly 3 pages discussing farm diversification and employment growth in rural areas, but very little discussion regarding the issues and options of employment growth in the market towns.

The document feels as though the market towns are not considered a priority for employment growth, yet NPPF 106 states [emphasis added]

*“Planning policies should:*

- a) *support an appropriate mix of uses across an area, and within larger scale sites, **to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities**”;*

The Local plan should focus on growing employment opportunities in the market towns unless it can be shown that developing employment sites in rural areas minimizes the number and length of journeys needed for employment. Small scale farm diversification may be beneficial and appropriate, but a large number of business units in rural locations across the District is likely to increase the number and length of journeys needed for employment and make the transition to a zero-carbon economy more challenging.

**The Issues and Options report has not sufficiently identified the** key economic challenges and opportunities facing Dereham and has not taken account of the impact and opportunities the improvements to the A47 will have.

**Question 22** -- No - The local Plan should aim for more economic growth, and to reduce the need to travel to work, Breckland already has a low level of jobs as a proportion of the working age population.

**Question 23** – Yes – this is the most sustainable pattern, but Dereham has a poor supply of employment land.

**Question 24** – Dereham

**Question 26** – No employment should be directed to the market towns where more than 50% of the population live, this will then reduce the need to travel and increase active travel.

**Question 27** -Most important in order.

- 1) Number 8 - Proximity of employment to housing.
- 2) Number 5 – More flexible office space and industrial space in our Market Towns
- 3) Number 1- Improve digital connectivity on business sites rather than across the district.
- 4) Improve active travel and connectivity around market towns.

**Page 37**

**Question 30.** No - The Council should not adopt a more flexible approach. Allowing employment growth in rural areas is no different to allowing housing growth in rural areas, it will lead to an increase in travel and make the transition to a zero-carbon future more of a challenge. Employment should be focused in areas close enough to the market towns to enable active travel.

**Page 39.**

**Question 33** – in order of importance.

- 1) **Number 10** is the most important. There has been a gradual conversion of retail unites to residential, if the trend continues the Town Centre will eventually cease to have a purpose and loose much of its vitality.
- 2) **Number 5.**

The Town Council is happy to see the town centres evolve away from retail provided that there are policies in place to ensure they retain their prominence as an economic centre and do not become residential areas.

**Page 40–**

**Question 34.** Why are rural facilities valued more than facilities in the towns? If there are going to be policies, these should look at all valued facilities not only those in rural areas.

**Page 42 – number 2** – Walking, cycling and public transport need to be split out because they are very different; it might be worth also including e-bikes. Cycling 3 miles on good cycle lanes is not a hardship for many people and is probably as quick as driving a car. But walking 3 miles is quite a walk. Public transport is beneficial for access to services (depending on frequency) but there is no direct health benefit as there is with active travel.

Because they are quite different they need to be considered separately rather than being grouped together e.g.



- Walking - more people will walk rather cycle. Ensuring people can walk to services should be the first priority.
- Cycling – would be more popular if conditions in the road were safer. Cycling should only be considered an option where there are safe and convenient cycling facilities to access services.
- Bus – more sustainable than a car (if well used) but not as sustainable as walking and cycling, and bus travel removes the freedom to choose when to travel. The guidance suggests that public transport is significantly beneficial for health where people live close to public transport hubs such as train stations and bus interchanges. This isn't the same as living near a bus stop. Public transport should only be included where it relates to transport hubs with multiple options for travel.

#### **Page 45**

**Question 43:** - Yes - The council should be considering a high biodiversity net gain. But this should really be linked to connecting habitats using local green infrastructure plans, rather than buying credits off-site. If there is a public health benefit from connecting with nature, then high quality nature should be created where people can connect to it and it is related to the development.

#### **Page 47:**

**Question 44** – Yes - But this is quite a large topic and would need detailed consideration and a more comprehensive response than can be given here.

#### **Page 50**

**9.11** – Construction Standards should be adopted to ensure all new developments are net Zero by 2025 to ensure the target of net-zero by 2035 is not compromised. Some house builders in Breckland already fit PVs to every property, if one can do it, why not all?

#### **Page 51**

**Third bullet point** – electric charging points should be on all new properties at a point where people will be parking their cars.

**Fourth bullet point** – “promote Cycling and Walking on new developments to reduce car use” – the Council doesn't feel this is terribly ambitious; “promoting” can just mean giving people a leaflet saying ‘have you thought about walking and cycling’!

“on new developments” simply means; only on the development site itself, not connecting the site to places where people might want to cycle to. The Council feels this needs to be more ambitious and specific.

Norfolk County Council's guidance for developers states that there is a requirement to:

*“Link new development into the existing cycle network and public rights of way to create a sustainable travel infrastructure which encourages healthier travel for work, easier access to public transport, healthier journeys to school and education as well as leisure opportunities”.*

The Local Plan needs to be more specific and more aspirational in making active travel a genuine choice for local journeys. The Local Plan will then better reflect Norfolk County Council's guidance for developers.

## Page 52

**Greywater harvesting-** the Town Council is very supportive of greywater harvesting.

## Page 53

**Question 48** – Yes; the Council is supportive, subject to the comments above -

## Page 55 – question 50

**In order of most importance:**

- 1) **Number one** – but should be where most day to day services can be accessed using active travel and where the distance to other services is reduced to the absolute minimum.
- 2) **Number five.** Safe walking and cycling routes from rural areas to market towns should only be considered once the cycling and walking network in the market towns is comprehensive and complete. There is no point being able to safely cycle from, say, Yaxham to Dereham; only to find you are unable to cycle in the Town because the network is so hostile to cyclists. It makes no sense to create routes out of the towns until there is a completed cycle network within the towns. Realistically very few people are going to walk into Dereham from the surrounding rural area.
- 3) **Number seven.**

## Page 59

**Question 54** – in 2003 Breckland Council produced a study identifying locations which would be suitable for different types of wind turbine. Something similar could be produced to cover wind and solar.

## Page 59

**Question 55** – Breckland Council's open spaces assessment 2015 identified a deficit in Outdoor Playing Space in all parishes. This study identified a 34ha deficit in Dereham. A more detailed open space assessment carried out by Dereham Town Council identified a deficit in Outdoor Playing Space of 21ha. What is clear (and evidenced) however is, since Breckland started carrying out open space assessment, the deficit has been increasing this clearly shows that the policy is not working.

**Question 57** - No - The policies currently do not deliver the required amount of Outdoor Playing Space specified in the policy. The policy routinely allows developers to negate the provision of areas for sport. This situation is not helped because Officers only ever talk about the requirement to provide Open Space rather than the requirement to provide Outdoor Playing Space, which is a specific type of Open Space. This leads to confusion with the developers over what they need to provide.

The current policy only protects 'designated' open space. The policy should be revised to say that 'all public open space and amenity land will be protected. This will then conform with the NPPF paragraph 99 which states:

*“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless....”*

## Question 58 - Key Infrastructure requirements.

1. Ensure the delivery of a coherent cycle network.
2. Ensure delivery of Outdoor Playing Space on the development site rather than off-site contributions.

3. Vehicle charging points on every property at locations where vehicles would normally be parked.
4. Ensuring new developments have sufficient electricity supply
5. Congestion in Dereham is still a major planning challenge and needs to be considered at the early stages of the review of the Local Plan.
6. Doctors surgery in Toftwood.
7. Measures to improve bus movements in the Town Centre, to accommodate the anticipated increase in bus movements.
8. Options should be explored to introduce a Park and Ride facility in Dereham to utilise the frequent bus service to Norwich from Dereham. This would enable residents from the surrounding villages to make greater use of public transport.

**Chairman**