

APPENDIX 2
Dereham Town Council
Meeting for Plans at the Assembly Rooms on Tuesday 9th October 2018 at 7.00pm

Comments regarding planning application
October 2018
3PL/2010/1361/F
Erection of 255 dwellings with associated open space

Land East of Yaxham Road South of Dumpling Green

1. Congestion Analysis and the residual cumulative impact of the congestion levels.

The application should be refused in accordance with the NPPF, because the residual cumulative impact of the transport network will be severe.

Norfolk County Council's document 'Safe and Sustainable Development' provides guidance on transport issues as they relate to new developments.

The guidance defines the planning terms 'material' and 'significant' as:

"any increase in traffic on a link of a junction, where all links into a junction have less than 15% spare capacity at peak times".

- The Dereham transport study identified that the Tavern Lane junction is currently operating with no spare capacity at peak times.
- The Transport Assessment for this application identifies that the Lynn Hill mini roundabout is currently operating with no spare capacity on any of its links.

The level of congestion at both these junctions is both a Material and Significant consideration.

The Transport Assessment for this application identifies that, taking this development along with the other committed developments into account:

- The Lynn Hill mini roundabout junction **queue lengths will increase up to 4 fold in the next 7 years**. i.e. it is predicted that whatever queues are being experienced now at Lynn Hill, will be 4 times longer in 7 years' time.
- **The queues at the Tavern Lane junction will be twice as long in 7 years' time.** The queues that are being experienced at Tavern Lane now will be twice as long in 7 years' time.

The NPPF states that developments should only be refused on transport grounds where the residual cumulative impacts of developments are "**severe**"

Norfolk County Council Guidance states that with regards to the NPPF a "**severe**" impact is deemed to occur when "*increases in delays and or/or queues at a junction are unacceptable*". [unacceptable' is not defined in the guidance therefore the dictionary definition can be used]

The queues at these two junctions are currently considered unacceptable by most people, so the fact that they will be four times worse in just 7 years' is totally unacceptable. Even if this development on its own only contributes a small proportion of that increase, it is an increase. So this development will be making an unacceptable situation 4% worse therefore the impact will be "severe".

The Dereham Transport study identified a signalised roundabout for the Tavern Lane junction, no funding has been set aside to deliver this, no developers are being asked to contribute towards it. Nor has a scheme been proposed for the Lynn Hill mini roundabout. The applicant does not seem to be contributing to infrastructure identified in the Dereham Transport study as being needed for development to take place.

Sustainability Matters.

The proposal should be refused because the proposed development does not adequately provide off-site facilities for cyclists to link with existing provision and local services. Contrary to Development Plan Policies GEN02 and TRO1.

The application should be turned down for the following reasons.

The Breckland Council Transport study carried out by WYG and adopted as evidence for the Local Plan states that 12.4.2 – “if large scale developments were allocated the provision of new or improved bus services and good pedestrian **and cycle links** would ensure that the sites were accessible by non-car modes, **with the result that the pressure on the highway network would be reduced**” [emphasis added].

The WYG transport study has been adopted by Breckland Council and Norfolk County Council and been subject to public inspection by an inspector appointed by the Government.

The recommendations within the WYG study are sound, as the Study has passed the Inspector, WYG’s recommendation for improved cycle links to be made should be implemented. If the recommendations in the WYG study are not implemented in full then it brings into question the evidence base for the Local Plan.

The developer is proposing a shared use cycle/pedestrian path on the south side of Yaxham Road. It is believed that the shared footway is already in place and was part of the off-site contribution for the former Cemex site. – however **to make this link meet current standards it would be beneficial and safer to give priority to the shared use facility at side road. Giving cycle lanes priority at side roads is now a standard design feature, and has been implemented throughout Norwich and helps reduce cycle casualties.**

The Planning Practice Guidance (PPG) on Travel Plans place considerable emphasis on ensuring that sustainable transport choices are a real option for residents. The applicant’s Travel Plan Framework (TPF), made reference to the Travel Plan Good Practice guidance 2005. The more recent 2009 guidance identifies the most important element of any TPF is that the physical infrastructure is first put in place to ensure that the environment is conducive for cycling and links can be made to existing cycle routes. **This has not been addressed in the application.**

It is self-evident that soft measures to encouraging cycling as proposed by the applicant in the TPF 8.4 will have absolutely no effect, if the highway connecting the development to likely destinations is unsafe for cyclists.

The Application should be refused because the Residential Travel Plan has not demonstrated how residents can effectively cycle to likely services.

Breckland Emerging Local Plan Policy GEN 2 (which was not contested at inspection therefore carries considerable weight in determining planning applications) states that; the Council will require that “ all new developments will maximise connectivity within and through a development **and to the surrounding areas, including the provision of high quality and safe pedestrian cycle routes**” [emphasis added].

The proposed development gets cyclists safely to the level crossing on Yaxham Road but not beyond. According to standards laid out in Local Transport Note 2/08, the volume of traffic and level of congestion, at this location, means that this area is not suitable for most people to cycle in the highway.

The applicant has shown in the Transport Assessment; a walking isochrone which shows that the town centre and the high schools are outside of a reasonable walking distance of the development, but they have not shown that there is a reasonable cycling route to the high schools and the town centre. Without such an analysis of the cycling routes it is difficult to see if the site is: sustainable in terms of the NPPF, conforms with the Planning Practice Guidance on Travel Plans and meets the requirements of Local Plan Policy GEN 02 and TR01. The Breckland Council’s emerging Sustainable Transport Policy TR01 would require an analysis of cycle routes to take place using

a standard methodology such as the Cycling Level of Service, which enables the analysis of particular routes and aids identification of where improvements need to be made to make the environment more attractive to cyclists.

The particular issue with this site, is that much of the network between this site and likely destinations such as high schools and the Town Centre, involve trying to negotiate Yaxham Road - Lynn Hill. The traffic volumes (see LTN 2/08) and congestion in this area mean that all routes have critical factors that would make the route unsafe for cyclists (see the Cycling Level of Service tool and LTN2/08).

It is worth noting that, with regards to cyclists, it is no use simply reviewing the accident data and saying there have not been many accidents therefore the roads are safe for cyclists (as some application have tried to do). LTN 2/08 along with other guidance such as the Cycle Level of Service, are very clear that it is the perceptions of danger that deter people from cycling. This is especially true for female cyclists, it is now well accepted that perceptions of danger is the biggest single barrier to women cycling on a regular basis. **This is therefore an equality issues for which Breckland Council have a duty to consider.**

Environmental Impact Assessment

The environmental impact assessment is still out of date and should be carried out again because Great Crested newts have been identified near the development site.