

DEREHAM TOWN COUNCIL

20th February 2024

At an additional meeting of the **Full Council** held on **Tuesday 20th February 2024** in the Memorial Hall at **7.30pm**.

Present: Councillors L Monument (Chairman), Z Flint, P Duigan, A Greenwood and P Morton.

Also in attendance: Town Clerk T Needham.

114. To receive apologies for absence.

Apologies for absence were received from Councillors A Brooks, S Green, R O'Callaghan, H Clarke, C Coleman, K Cogman and H King.

115. Declaration of Interest.

There were no declarations of interest.

The meeting was not quorate.

Chairman

Councillors present felt that given the nature and urgency of the work identified under Agenda Item 3 that the Clerk had sufficient delegate powers to make a decision, in consultation with the Deputy Mayor, the Chairman of Heritage and Open Spaces Committee and the Deputy Chairman of the Finance and Governance Committee.

After consultation, the Clerk agreed with Councillors Morton's recommendation and resolved to proceed and clear the ditches on land adjacent to the Neatherd.

Following consultation with Councillors L Monument, Z Flint, P Duigan, A Greenwood and P Morton, The Clerk submitted the following comments.

1) Regarding alternative criteria-based approach. (Breckland's Local Plan-Development Strategy Consultation)

Policy GEN 05 -settlement boundaries.

GEN 05 states that "Settlement Boundaries Within the defined settlement boundaries and the boundary for Attleborough SUE (as shown on the Policies

Map) proposals for new development are acceptable, subject to compliance with relevant Development plan policies.

Outside the defined settlement boundaries, development is restricted to recognise the intrinsic character and beauty of the countryside. Development outside the defined settlement boundaries will only be acceptable where it is compliant with all relevant policies set out in the development plan, including but not necessarily restricted to”:

The first part of the policy states that development outside the settlement boundary will be restricted.

The second paragraph of GEN 05 states that “development outside the defined settlement boundaries will only be acceptable where it is compliant with all relevant policies set out in the development”

This last paragraph has resulted in a development in the garden of Galley Moor Farmhouse adjacent to the Neatherd. The Town Council strongly objected to this application, but because of the last paragraph of GEN05 Breckland officers were unable to refuse the application.

Dereham Town Council recommends that GEN 05 be re-worded so that the last paragraph does not cancel the first paragraph, the current wording has led to unacceptable forms of development. Whether there is or is not a settlement boundary, planning policies should not lead to unplanned and unacceptable forms of development.

2) Regarding the new development strategy options. (Breckland’s Local Plan-Development Strategy Consultation)

Dereham Town Council is of the view that all and every Development strategy will result in additional and unacceptable levels of traffic and congestion in Dereham. The last Local Plan included a Transport Study which identified that certain junctions would be over capacity, with a number of junctions needing major interventions. None of these major interventions have been delivered with some identified as being undeliverable.

Dereham Town Council strongly asserts that as part of the Local Plan, there should be comprehensive transport study and strategy, for Dereham, covering all modes of transport including public transport. Such a study is required for the Local Plan to be compliant with the NPPF paragraph 108, which states that “*transport issues should be considered from the earliest stages of plan making so that the potential impacts of development on the transport networks can be addressed*”.

Along with the specific transport concerns it is also very concerned with the ongoing ad-hoc and piecemeal form of development which may continue to be delivered in Dereham. The Town Council has been consistent over the years in being supportive of additional housing provided it is properly planned and balanced to deliver the services, outdoor playing space, infrastructure, employment and does not adversely impact on the already overburdened road network. The Town Council feels that there needs to be more master planning

of Development in Dereham which would deliver:

- Sufficient employment land
- Services including schools, dentists, doctors.
- Comprehensive transport strategy

It does not appear that these matters have yet been fully addressed in the Local Plan so far.

3) Regarding the Site Assessment. (Breckland’s Local Plan-Development Strategy Consultation)

General Comments

The Assessment criteria considers vehicular access and pedestrian access, but it does not consider cycling access from the site to likely destinations. The National Planning Policy Framework (NPPF) states, at:

- paragraph 108 transport issues should be considered from the earliest stages of plan making; so that opportunities to promote walking, cycling and public transport are identified and pursued.
- Paragraph 109 The planning system should actively manage patterns of growth to ensure a genuine choice of transport modes.
- Paragraph 110 Planning policies should – provide for attractive well-designed walking and cycling networks.
- Paragraph 116 applications for development should give priority first to pedestrian and cycling movements, both within the scheme and to the neighbouring areas.

To be compliant with the NPPF, the site assessments need to be reviewed in order to include access for cycling.

Individual site comment.

Site	Assessment Criteria	Comment	Alternative assessment
West of Golf Course	Built up area	This site doesn't appear to be adjacent to the built-up area. Nor is it adjacent to a railway line.	Red
Land at Norwich Road	Pedestrian Access	Pedestrian Access seems quite good	Green
	Settlement Boundary	It is inside the settlement boundary	Green
Dereham Hospital, Northgate	Highways	This seems odd as it is always in the local plan!	Amber
	Pedestrian Access	Not significant	Green
	Trees and hedgerows	Scrub rather than trees	Amber

Land at Grange Farm Etling Green	Highways Access	Depends where the access is coming from off Etling green then red off the highway green	Red
	Built up area	This site doesn't appear to be adjacent to the built-up area	Red
	Scale and size	Development would have a serious impact on form and character of existing hamlet of Etling Green	Red
Land North of Swanton Road	Potential coalescence	This would effectively connect the settlement of Dereham with the Hamlet of Northall Green.	Red
Land at Swanton Road LPRC4SDEV344	This site has no assessment		
Moat Field, Northall Green	Highways Access	Access via narrow lane	Amber
	Built-up area	Not adjacent to the built up area of Dereham	Red
	Settlement Boundaries	Not adjacent to existing settlement boundary	Red
	Scale and size	Development impact on form and character of existing hamlet of Northall Green	Red
Fieldfare Etling Green	Highways Access	Not adjacent to a highway	Red
	Pedestrian Access	No pedestrian access to any services	Red
	Built up area	Etling Green is not a built up area, nor is it adjacent to the built up area of Dereham	Red
Meadoway Etling Green	Highways Access	Not adjacent to highways	Red
	Pedestrian Access	No pedestrian access to any services	Red
	Built up area	Etling Green is not a built up area, nor is it adjacent to the built up area of Dereham	Red
Sandy Lane	Built up area	Not adjacent to existing built up area	Red
Quebec Farm	Greenfield/Brownfield	Not sure how this could be described as Brownfield. Definitely Greenfield	Red
	Highways Access	Poor road network	Amber

4) Comments on the Phase 2 site assessments.

At the rear of the Site Assessments Phase 1 Report (November 2023), paragraph 5.2 details the methodology that will be used to assess sites remaining after the phase 1 Assessment. With regards the Phase 2 Assessment.

Cycling - Neither the phase 1 nor the phase 2 assessment included an assessment for cycling. The NPPF states; at

Paragraph 108 transport issues should be considered from the earliest stages of plan making; so that opportunities to promote walking, cycling and public transport are identified and pursued.

Paragraph 109 The planning system should actively manage patterns of growth to ensure a genuine choice of transport modes.

Paragraph 110 Planning policies should – provide for attractive well-designed walking and cycling networks.

Paragraph 116 applications for development should give priority first to pedestrian and cycling movements, both within the scheme to the neighbouring areas.

The Assessments are not compliant with the NPPF if proper consideration is not given to cycling at this early stage of the plan making process.

The Town Council is not suggesting that everybody should cycle but, it is self-evident, that if people who want to cycle and are able to cycle, it will reduce the number of cars on the road network, minimise congestion.

An assessment of how accessible the site is for cycling could be made using information from Government guidance contained within LTN 1/20. The table below is from LTN 1/20 and shows the level of participation in cycling for different traffic volumes/speeds with no interventions (Mixed Traffic) and various levels of intervention. This table also gives an indication as to the types of interventions in particular situations which is likely to make cycling a genuine choice as per NPPF 109.

Figure 4.1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation		
20 mph ³	0	Green	Green	Green	Green	Green
	2000	Green	Green	Green	Green	Green
	4000	Green	Green	Green	Yellow	Yellow
	6000+	Green	Green	Green	Yellow	Yellow
30 mph	0	Green	Green	Green	Yellow	Yellow
	2000	Green	Green	Green	Yellow	Yellow
	4000	Green	Green	Green	Yellow	Yellow
	6000+	Green	Green	Green	Yellow	Yellow
40 mph	Any	Green	Yellow	Yellow	Pink	Pink
50+ mph	Any	Green	Pink	Pink	Pink	Pink

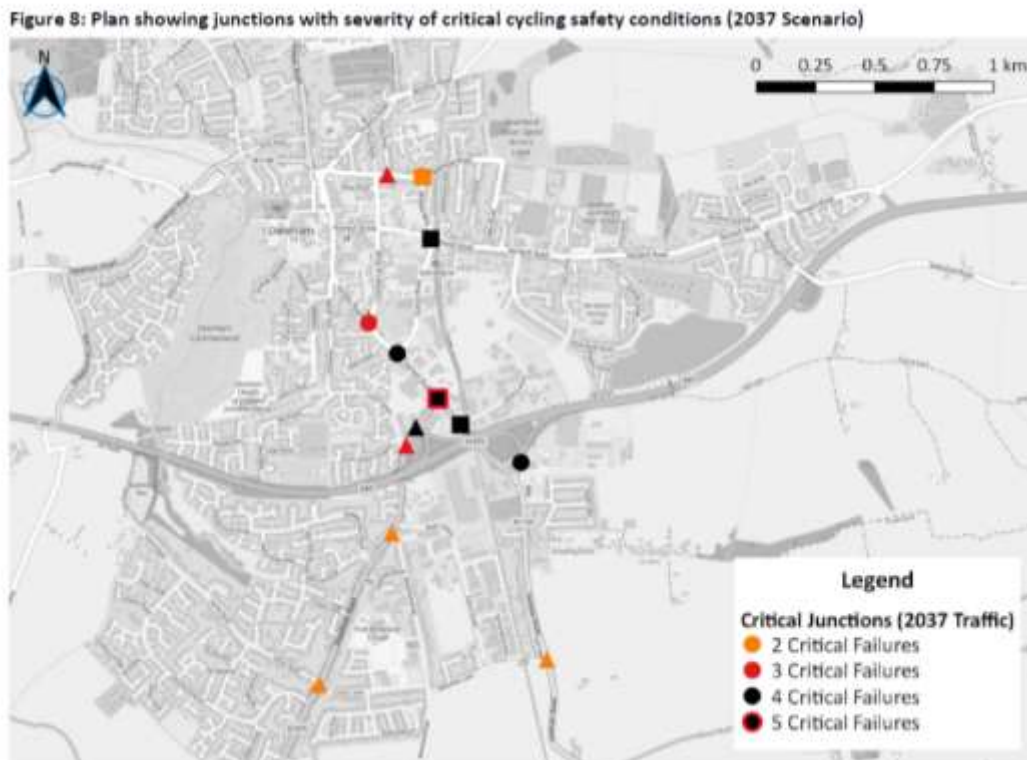
- Provision suitable for most people
- Provision not suitable for all people and will exclude some potential users and/or have safety concerns
- Provision suitable for few people and will exclude most potential users and/or have safety concerns

- Notes:
1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied.
 2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow.
 3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day.

Given the volumes of traffic on the main routes in Dereham to make cycling a realistic choice for most people, there would need to be some form of segregation. Clearly some routes will better lend themselves to segregation than others. This is an important consideration and needs to be factored in as part of the site assessment. The Town Council commissioned an assessment from consultants PJA; this study looked at critical junctions as these are the places where accidents are more likely to occur. The study clearly demonstrated that the road network in Dereham is largely hostile to all but the most confident cyclist. Summary of findings below:

Walking Assessment.

At section 5.2 (7)(8)(9)(10) [extract below] there is an assessment criteria to look at walking distances.



- (7) Distance to the facilities (measured from the edge of the site). Accessibility will be assessed based on –
- (8) **Green** Four or more core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment
- (9) **Amber** One to three core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment
- (10) **Red** No core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment or no ability to provide/ fund appropriate new core services.
 - (a) Facilities include:
 - (i) A primary school,
 - (ii) A secondary school
 - (iii) A local healthcare service (doctors' surgery)
 - (iv) Retail and service provision for day to day needs (district/local shopping centre, village shop)
 - (v) Local employment opportunities (principally existing employment sites, but designated or proposed employment area in a local plan will also be considered)
 - (vi) A peak-time public transport service to/from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm).

It is clear what the criteria is trying to do, but

1. the wording isn't very clear,
2. it is not clear where the distances states are drawn from
3. it doesn't recognise different destinations have different walking distances

The purpose of this assessment, it is assumed, is to identify the most sustainable location for development, so that walking to meet most daily needs is a realistic choice for most people.

This assessment is really important for Dereham with its issues with congestion. It is self-evident that the more people who can walk to meet their daily needs it gives people a genuine choice (NPPF 109) and it will free up road space for those people who wish to or need to drive.

Suggested alternative approach.

Firstly identify key services which would fulfil most people's daily needs and identify how far most people would be prepared to walk to such services. It must also be remembered that the elderly and disabled will not be able to walk as far as able bodied people. Fareham Borough Council has produced an Accessibility Standard for its Local Plan, this is set out below:

Facilities and Associated Accessibility Standardⁱ

Facilities	Accessibility Standard in Metres (m)	Approximate Walking Time (minutes)
GP surgeries	1,200m	15
Bus stops* Peak-time to and from higher order settlement.	400m	5
Train station	1,600m	20
Community and leisure	800m	10
Secondary schools	1,600m	20
Primary schools**	800m	10
Newsagents/convenience store	800m	10
Town/district centres/parades	1,600m	20
Designated employment areas	1,600m	20
Accessible green spaces (unrestricted and not including greenways or incidental spaces) or play space	800m	10

ⁱincorporating 10(vi) from the Site Assessments Phase 1 Report (November 2023)

**suggested amendment by Dereham Town Council

There may be certain services (Key Services) that are more important than others such that every development must be within walking distance of that service, say primary, secondary schools, bus stop to higher order settlement and accessible green space. Then of the sites that are accessible on foot to the key services the sites with the greater number of other services, accessible on foot, will be the most sustainable.

ⁱ [Background Paper: Accessibility Study, 2018, Fareham Borough Council](#)