

Dereham Town Council

Full Council

13th September 2022

Agenda Notes.

10. To consider Breckland Local Plan Partial Review Policy INF03.

The consultation submission document (Regulation 19) is enclosed. When the current Local Plan was approved, because there were some outstanding issues, a requirement was placed on Breckland Council that they conduct an early partial review to address the outstanding issues. As explained in the Document enclosed, with reasons, the partial review was not started immediately.

This consultation is to change the policy INF03 from requiring a review to be carried out immediately and completed by November 2022 to carrying out a full review now with completion by December 2024.

Changing the wording of the policy should mean that certain policies will not become out of date hopefully preventing the district from being open to developments outside current policies and settlement boundaries.

This change in policy is not contentious, Breckland cannot go back in time and start the partial review 2 years ago, the only option is to start the total review now as is proposed.

While the review of Policy INF03 does not raise any concerns, a report produced to support the review (The Integrated Assessment of the Breckland Local Plan Partial Review Scoping report 2022) does raise a few questions which the Council may like to comment on. As this does not affect the proposed change to policy INF03, it is listed as a separate agenda item below.

11. To consider commenting on the Breckland Council Integrated Assessment of the Breckland Local Plan Partial Review Scoping report 2022.

The report is enclosed, with comments for consideration below. While this is not part of the current consultation, these are early days in terms of the Local Plan, so a good time to formally feedback comments on what Councillors feel are important sustainability issues for Dereham. While there is no guarantee that any comments will be taken forward and incorporated into future work, if the Council does not comment then comments cannot be taken into consideration.

From the [Scoping report](#)

Page	Paragraph	Comments
31	Last paragraph – health deprivation	What the report hasn't recognised is that health deprivation is mainly located in Dereham, Thetford and Swaffham.
32	1 st Paragraph	Obese children has been chosen as a measure, but the report has not then linked this issue to opportunities within the planning system to reduce childhood obesity, links could be: <ul style="list-style-type: none">• Improving income, reducing poverty – delivering ample employment opportunities close enough for people to walk to work. This historically has not

		<p>happened in Dereham, evidenced by the distance people travel to work. Employment land allocated in the local plan in Dereham has seen no activity by the District Council to resolve the access issues and bring the land forward for employment.</p> <ul style="list-style-type: none"> • Active travel – ensuring firstly that children can walk to schools by locating new developments within 15 minute walk to schools but particularly high schools. If development cannot be located within walking 15min walking distance then look at 1.5mile cycling distance ensuring safe cycling routes to school, can be achieved taking into consideration perceptions of safety as noted in para 4.11 of the Local Plan. • Ensuring delivery of outdoor playing space in accordance with Policy ENV04. Breckland has a track record of not delivering outdoor playing space, in accordance with policy DC11 or ENV04, evidenced by the increasing deficit in areas for sport.
32	2 nd Paragraph and last paragraph.	<p>This is not correct, while there are some small villages with few services; this doesn't mean they are deprived. They may be deprived in terms of access to services if they do not own a car, but access to services is only one of a number of domains which measure overall deprivation.</p> <p>Norfolk County Council's JSNA briefing describes deprivation in Norfolk as: <i>being centred around urban areas such as Norwich Gt Yarmouth and Kings Lynn, as well as some market towns such as Thetford, Dereham and Watton despite there being less deprived areas just outside the market towns.</i></p> <p>For this report to suggest in the last paragraph that the rural areas are more deprived than the towns seems to contradict Norfolk County Council's assessment.</p> <p>In fact between 2015 and 2019 using the indices of multiple deprivation (IMD), Dereham was one of a few areas within Breckland where deprivation got worse rather than got better or stayed the same.</p>
33	Figure 11	It is titled Indices of Multiple Deprivation (IMD) 2019 but the figure is of IMD 2015. This is relevant because as stated above, between 2015 and 2019 the IMD in Dereham actually got worse.
35	4 th Bullet Point	The main areas of deprivation are in the market towns with areas such as Dereham becoming more deprived since 2015.
35	5 th Bullet point	'Level of crime is less than urban areas' not sure how useful it is comparing Breckland's crime to urban areas. If however crime is generally higher in Breckland than similar rural districts, that probably is relevant if correct and should be explored further.

42	Second Paragraph	While trends in online shopping will impact on town centres, there is a danger in discussing very specific future uses such as 'community and leisure'. It should perhaps be less specific and talk about the town centres evolving to meet the future needs.
42	Last paragraph	<p>The loss of retail and commercial space to residential units, would be an interesting metric to look at. Quite a number of retail units have been converted to residential in the last few years, potentially reducing the overall town centre offer. Clearly if the trend of losing retail and commercial floor space to residential units continues, eventually the town centre may no longer be a viable centre for commerce or a place to visit. It would be useful to understand the rate at which units are being lost to residential and what the likely impact this would be over time.</p> <p>So in the preceding paragraph, it states that the town centres need to expand their role as a destination for a wide range of community and leisure uses as well as shopping activities, but there is little understanding as to the impact of converting retail and commercial units into residential units is having on the town centres.</p>
43	2 nd and 3 rd Paragraph	<p>One of the reasons Breckland are having to review the Local Plan is because the 2017 Employment Growth Study did not take account of the dualling of the A47 to Norwich. The 2017 study may be relevant to other areas of the district but is not relevant for Dereham's employment growth. The report should recognise that the 2017 study is not relevant to Dereham because it didn't take account of the dualling of the A47.</p> <p>The employment growth study projecting employment sector growth is over 11 years old, probably too dated to be taken too seriously. The New Anglia LEP's most recent strategy identifies advanced manufacturing and engineering as a growth sector, rather than a declining sector.</p>
47	4 th Bullet point	<p>This seems to contradict the 3rd bullet point, employment in leisure and the arts is not generally associated with high value employment. Referring back to figure 25, leisure and the arts are a small growth sector, business services, real estate or employment activities (whatever they are) have a much higher growth rate. The predictions in fig 25 came from 2011 and were incorporated into the 2017 employment growth study, which, as mentioned above, didn't take account of the dualling of the A47.</p> <p>Within 15 minutes travel time from Dereham, along the A47, there is an international centre for life sciences, a university hospital, an agrifood tec centre and a university. With Norwich being a centre for a number of important sectors the question should be asked as to whether employment growth in leisure and the arts is the best or only opportunity for employment growth in the Town Centre.</p>

		<p>While this bullet point may only be thinking about the town centres, it seems odd that arts and leisure get such a specific mention, when there are so many other opportunities. It may be more appropriate to talk about the town centres evolving rather than being specific about a specific sector such as arts and culture.</p>
47	General	<p>Page 44 identifies that many Breckland residents need to travel outside the district to work. Anything which involves travel is more than likely a climate change issue. If work can be provided close to where people live and reduce the need for people to travel outside the district to work, this will more than likely reduce carbon emissions. It would be good to understand why many people needing to travel outside the district to work is not considered a climate change issue? Dereham has employment land allocated in the Local Plan but it is currently not accessible and as far as it is known the District Council has not progressed any work to bring this land forward for employment use.</p>
48	7 th and 8 th bullet points	<p>Allotments and cemeteries are not normally considered open spaces. They are part of the Green Infrastructure but not public open spaces.</p>
49	1 st paragraph	<p>The 2015 open spaces study did not look at access to the countryside, it is unclear where the statement “with good access to the countryside comes from”? If the author is refereeing to the Accessible Natural Greenspace Standard (ANGST) then Dereham and particularly the southern part of Dereham have a deficit of accessible natural green space.</p>
49	1 st Paragraph last sentence	<p>Formal sports pitches need to be accessible by a range of transport modes, informal sports provision on the other hand, should be provided close to where people live, so they can walk.</p>
49	General	<p>What is not recognised in the report is that the provision of outdoor playing space has been getting worse because the policies are inadequate to ensure the correct amount of provision. This is particularly true for areas of informal sport on the development site. There is a deficit of outdoor playing spaces, this deficit is greatest in the market towns and getting worse, even though policies were put in place to prevent the situation getting progressively worse. i.e. the current policies are inadequate in delivering outdoor playing spaces in accordance with the policy ENV04 or its predecessor DC11.</p>
50	1 st Bullet point at bottom of page.	<p>States “whilst there are many areas of open space and access to the countryside across the district” the open spaces assessment 2015 only looked at outdoor playing space not access to the countryside or ANGST . The issue with outdoor playing space provision is not so much access, it is that there is not enough, and getting worse.</p>

50	2 nd bullet at bottom of page	The phrase deprived rural communities is mentioned again, even though deprivation is greatest in the market towns and in Dereham deprivation has been getting worse not better.
54	2 nd bullet point	About 10,500 households in Breckland have no car. 60% of those households are located in the 5 market towns. Dereham alone has 16% of the Breckland total. To help most people without car then the focus should be on the market towns.
54	5 th bullet point	Suggesting that active travel between rural areas and the urban centres could be improved contradicts para 4.7 of the local plan, which prioritises improvements to shorter journeys. The priority should be focused on enhance walking and cycling in the market towns first, because this is a relatively small targeted geography which would benefit 60% of the households with no car. The market towns are after all the areas which are going to see the greatest level of housing growth. It would also help reduce congestion at peak times. Traffic in Dereham is predicted to grow by 30% during the plan period. Moving people from cars to active travel will reduce the impact of this projected growth.
54	5 th bullet point	As per previous comment once the market towns have a high standard of walking and cycling facilities then it would make sense to encourage active travel out to the villages.
54	General	Is congestion in Dereham around Tavern Lane and Yaxham road roundabout no longer a transport issue for Dereham? Given that traffic in Dereham is projected to grow by 30% during the plan period, the Local Plan identified that the Tavern Lane junction, South Green Junction along with others will be operating over their design capacity unless interventions are introduced, it is surprising that this doesn't get a mention.
56	Second to last bullet	Which villages suffer from congestion and poor air quality? This is an issue for the towns not the villages.
64	3 rd bullet point	Is it nitrate neutrality or nutrient neutrality? Nitrate is one of a number of nutrients being controlled.

Sustainability Appraisal.

As part of the Local Plan Process, land owners and developers put forward land which they would like to develop. In order to assess which locations put forward for development are most sustainable, Breckland will produce a Sustainability Appraisal (SA). In the previous Local Plan, the SA is very good at identifying that the Towns were more sustainable locations for development than rural parishes, but what that SA was not good at was identifying which site around the towns were the most sustainable.

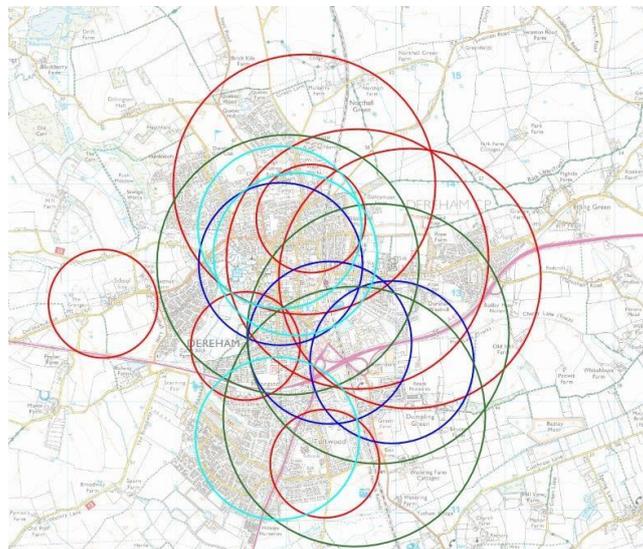
Now might be a good time to make a comment regarding the SA and whether a second, more fine grained, SA needs to be produced to identify which locations around the Towns are the most sustainable.

This fine grain SA could look in detail at:

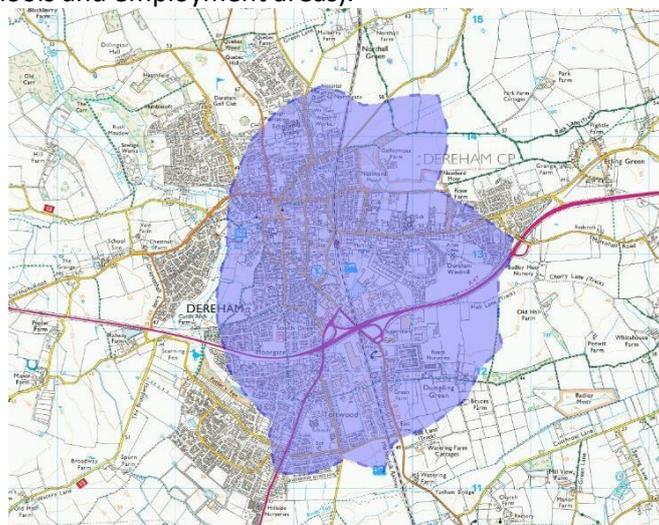
Walking Zone Analysis.

Walking is considered as the main alternative to the private car as more people walk than cycle. The plan below shows walking zones around various destinations. Different destinations are given different walking distances depending on propensity to walk to each type:

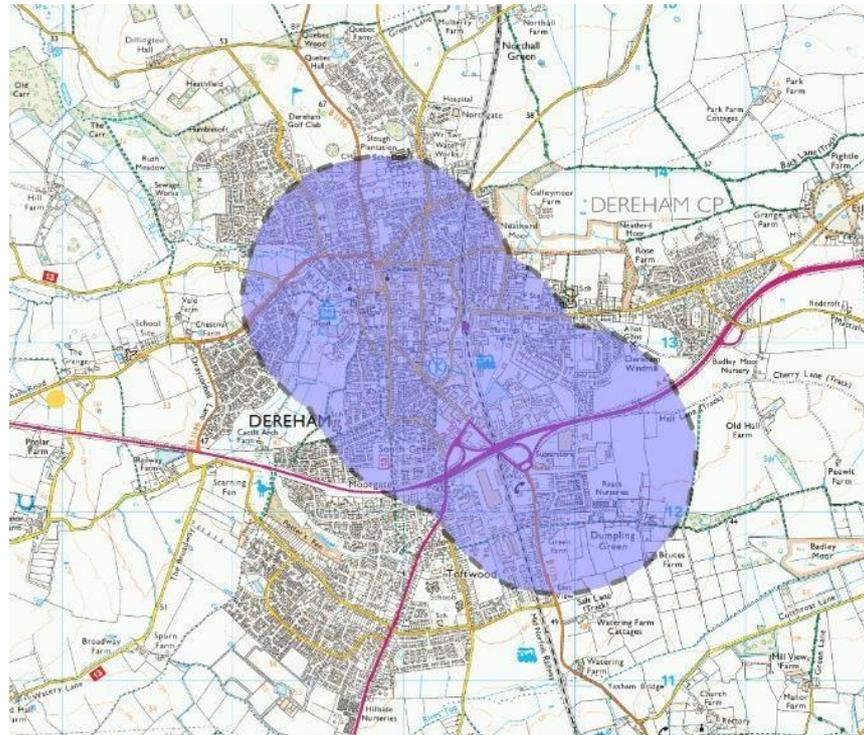
- 1 Junior Schools – red 500m
- 2 Secondary schools and sixth form – red 1,200m
- 3 Main shops – blue 750m
- 4 Employment centres – green 1,200m
- 5 Doctors – turquoise 750m



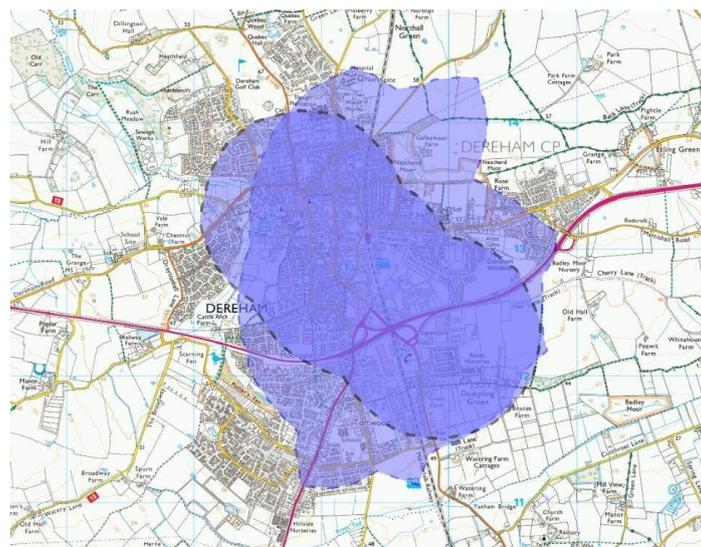
Walking Zones Plotted for weekdays where three walking zones overlap showing most sustainable location (including schools and employment areas).



Walking Zones Plotted for Saturdays where three zones overlap (excluding schools and employment areas).



Combining the weekday and weekends shows the most sustainable location for future growth in Dereham.



This approach supports the Governments Policy laid out in the report published by the DfT in March 2019 'Future of Mobility: Urban Strategy' a key principle of the Governments Strategy is that walking, cycling and active travel is the best option for short urban journeys.

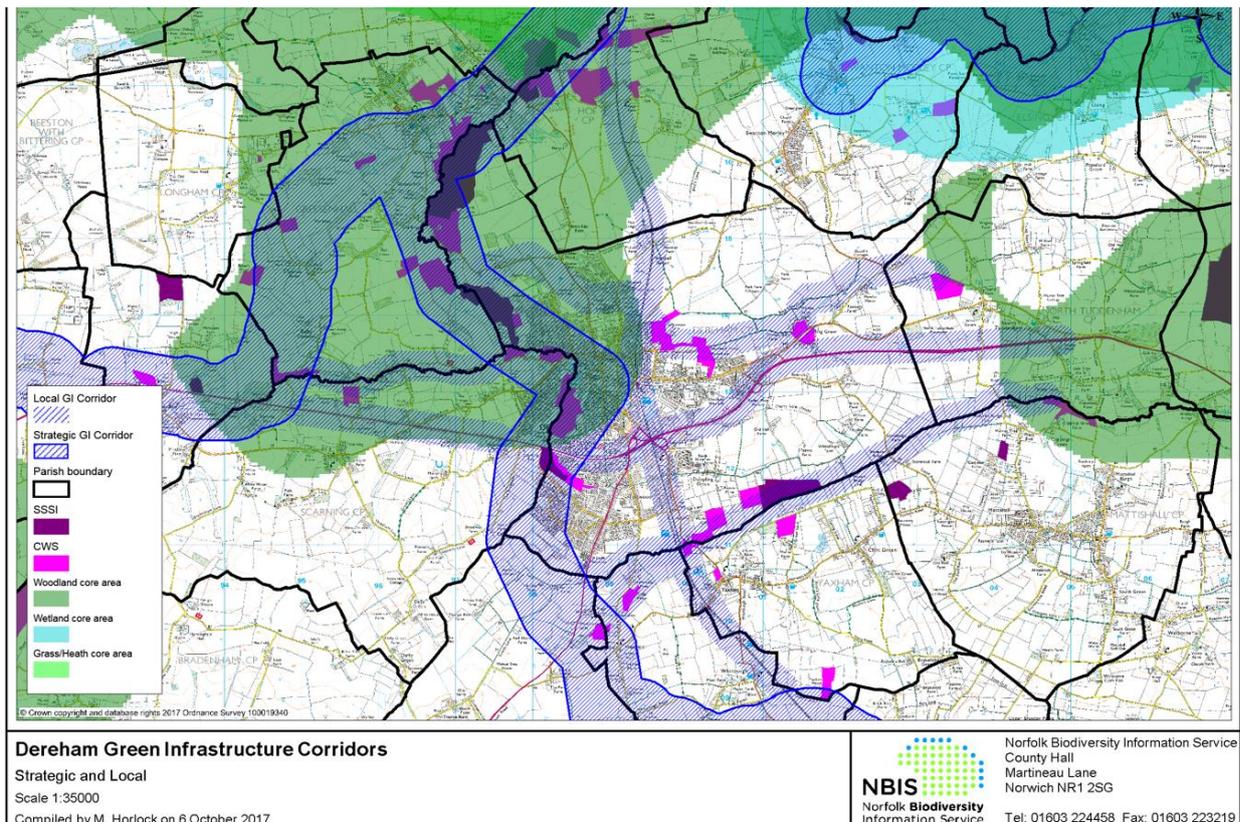
It is self-evident that the first step in ensuring that walking and cycling are the best option for local travel is to ensure that housing, employment and leisure are located in easy walking distance. Such locations, are the **most** sustainable locations.

Locating developments where people can walk to most services is the ideal, as more people will walk than cycle. A similar process to that above could be carried out for cycling to services. This is however a more complex process as safe routes, taking into consideration people's perceptions of safety, would require expert assessment. Given the volume of traffic in Dereham, many routes are unattractive to all but the most confident cyclists and prevents less confident cyclists having a genuine choice.

Ecological Networks.

Another aspect of a fine grained SA could be to include ecological networks. One of the reasons for the decline in biodiversity is as a result of the fragmentation of habitats. Ecological networks have been mapped at a County level and in 2017 the Town Council commissioned Norfolk County Council to look at the ecological networks around Dereham. Summary map below.

The Dereham network map below, identifies corridors which need protecting and/or enhancing. If such information were included in a SA then it might be possible to give greater weight to preserving and enhancing ecological networks around Dereham than if they were not included as part of the SA.



Councillors are being asked to consider whether they would like to make comments relating to the Sustainability Appraisal and suggest issues which should be considered as part of any sustainability appraisal.