

# DEREHAM TOWN COUNCIL

25<sup>th</sup> June 2024

At an **Extraordinary Meeting** of the **Full Council** held on **Tuesday 25<sup>th</sup> June 2024** at the Memorial Hall, Dereham at **7.30pm**.

**Present:** Councillors L Monument (Chairman), H Clarke, K Cogman, C Coleman, P Duigan, Z Flint, A Greenwood, H King, P Morton, R O'Callaghan.

Also in attendance: Town Clerk A Needham, Deputy Town Clerk J Barron, Town Council Officer G Snow.

27. **To consider apologies for absence.**

Apologies for absence were received from Councillor A Brooks.

28. **Declaration of Interest.**

There were no declarations of interest.

29. **To comment on Breckland Council's Draft Local Plan Preferred Options.**

The Clerk presented notes highlighting particular policy areas. Councillors went through the notes and Preferred Options, and Councillors discussed matters that could impact on Dereham. The Town Clerk would prepare draft notes which would be circulated to Councillors before submission as comments to Breckland Council's Draft Local Plan Preferred Options.

The comments submitted are attached to these minutes.

**Chairman**

Dereham Town Council  
25<sup>th</sup> June 2024

Comments and Observations  
Regarding the

Draft Local Plan Preferred Options Consultations – June 2024.

**Page 21 – Strategic Vision** – Third paragraph, if Dereham is to become a “strategic growth location” alongside Thetford and Attleborough, then before this happens there should be confirmation that Dereham will be afforded the same long term support and financial backing as Thetford and Attleborough have had in developing the master plan for their urban extensions.

**Page 26 – Sustainable Development Principles** – it appears that more thought has gone into the sustainability aspects of rural communities than the Towns. As most of the growth will be directed to Towns, more thought and consideration needs to be given to sustainability in the Towns. For example:

1. High potential for active travel but still a high reliance on the private car.
2. High potential for active travel but if development goes in the wrong place, distances make walking impractical, increasing the reliance on the private car and increase congestion.
3. Cycling and e-bikes have a great potential to increase sustainable and active travel, but the traffic volume prevents this being a realistic option for most people. Cycle links are not linked together to make a coherent network suitable for less confident cyclists.
4. Known traffic congestion at key junctions but the mitigation identified in the current Local Plan as being needed, has been deemed undeliverable, leaving the problem unresolved.

It was felt that NPPF 104 and 105 have not been given full consideration. While congestion has been ‘noted’ (para 1.23), it does not recognise that traffic flows at some key junctions are already set to increase by between 30% and 40% with existing allocations and no mitigation has been identified.

**Page 21 - Gen 01 General Development Principles**

It was felt that insufficient thought has been given to this in relation to the market towns. While some services will be available in rural villages, most people will still need to travel for work and for the vast majority of their needs. This will have an impact on the towns as service centres and this has not been given sufficient consideration.

As an example – between paragraphs 4.1 and 4.7 the word ‘rural’, in relation to specific issues, is mentioned 5 times but ‘towns’ or ‘market towns’ are not mentioned at all.

**Page 34 paragraph 4.29.**

The Council does not feel that Planning Officers require a more “flexible decision making tool” there already seems to be plenty of flexibility. Dereham Town Council feels that a defined settlement boundary would work better for the Towns and this would provide a clear definition as to where development can and can not generally take place. The term ‘built form’ is too nebulous and when considered alongside other preferred policy exceptions could lead to unplanned growth and development around the Towns. The settlement boundary is a clear line which the ordinary person can understand; trying to define the built form would be too difficult.

NPPF 16(d) states that policies should be ‘clear and unambiguous’ it is felt that, for towns, the concept of the ‘built form’ is too ambiguous.

**Specific comment – Gen 02** - Criteria F. omit the words “on the edge of the settlement” as it may suggest that open space etc within the settlement is not part of the ‘built form’ and can be developed.

**Page 35 – Gen 02.**

The general distribution does provide a significant percentage in locations where there will be a reliance on the private car. It would be helpful to understand how sustainability has been assessed. While there may be some services in rural villages, they will still look to Dereham for the majority of their needs, there needs to be some recognition of the cumulative impact which the over-reliance on the private car will have on local transport infrastructure within the town. All the developments surrounding Dereham will have some impact on the congestion in the Town: these developments should contribute to some measures to mitigate this impact and contribute towards measures to increase capacity at key junctions.

When assessing the impact on the Town, consideration should be given to the impact of additional bus services. There are very few pull-in bus stops in Dereham, when a bus stops to pick up passengers it holds up traffic and reduces the capacity of the network.

The employment areas at Shipdham and Snetterton are some distance from residential areas. Does this fit with NPPF 105?

**Page 40 - Chapter 5 Housing.**

The preferred direction is to have the plan operating over a period up to 2046 which will be approximately 20 years from adoption. NPPF 22, only requires a local plan’s strategic policies to cover a minimum of 15 years. NPPF 22 also states that where significant extensions to existing settlements are part of the strategy, these should project further ahead for at least 30 years.

The HEDNA study calculates the housing numbers Breckland will be expected to absorb. The HEDNA highlights a need in the range of between 15,625 and 16,525 homes; the proposal is to go with the high figure.

In para 5.7 – There is then the proposal to add an additional 8% on top of this number, the reason being to ensure choice, competition and to allow longer lead in times for the large strategic sites.

#### **Summarising the numbers:**

Housing needs HEDNA (excluding the 8% uplift) – 16,525

#### Housing supply

- Already allocated and proposed (no allocation in Dereham) including windfalls  
15,480 homes  
plus
- Abbey Estate 460 (para 5.28)

This gives a total supply of 15,940 homes leaving an additional allocation needed of 580 homes.

#### Comments.

If the calculations above are correct then:

1. The question must be asked why Thetford and Attleborough SUEs are not expected to deliver in accordance with the housing trajectory presented to the Planning inspector in 2018. If the 2018 projections had been correct then this would have delivered much of Breckland's housing needs up to 2046.
2. If Breckland Council chose a 15 year local plan, rather than a 20 year local plan, then there would not need to be such a large allocation of housing in this plan.
3. If Breckland Council chose not to pursue a Strategic Growth Option then it would not need the additional 8% buffer, because there is no problem with lead-in times. The 8% equates to an increase in allocation of 1,902, which is about the same as each of the Strategic Growth Options.

The Strategic Growth Option seem to be a choice rather than a necessity needed to deliver the numbers for this iteration of the Local Plan. The Town Council is not ideologically opposed to Dereham becoming a Strategic Growth Point, it is however strongly opposed to having such a status imposed with apparent haste, without comprehensive consideration of the issues, options, community engagement and proper consultation.

The Town Council also feels that if the Town is to become a strategic growth point then such a status should be accompanied by the funding that Attleborough and Thetford SUEs had to develop their comprehensive schemes.

The Town Council would like to see the time horizon for the local plan adjusted to 15 years to reduce the need for large allocations and allow more time for these strategic site options to be considered and properly planned. There is a very long lead in time needed for strategic urban extensions. The Thetford SUE was first announced in 2006, at the time it was expected to be built out by 2021. The preparation of the proposal took about 8 years and it is now not expected to deliver more than 60% of the allocation by 2046. Given the timescales associated with such large strategic growth, the Town Council does not see the necessity to

rush the decision. The Town Council would prefer to see more time made available for greater analysis and investigation before any proposal is actively pursued. Consideration should include the South East expansion option. While no land has come forward in this area at the moment, this is a plan to 2046 so it seems illogical not to consider all options including the South East expansion.

The Dereham Strategic Policy Option seems to rely on the evidence from the Dereham Network Improvement Strategy March 2019 (DNIS). Paragraph 5.40 of the Preferred Options document suggests that Dereham has been identified as a potential strategic growth area in the Local Plan on the basis of the results of the DNIS. The results of this study are however based on faulty assumptions:

- 1) In the transport study for the DNIS, for the South West growth option, there was no traffic assigned to the Tavern Lane/Yaxham Road junctions, it assumed that most people who worked in Dereham worked in the town centre. The DNIS only looked at travel to work distribution for weekdays, whereas it is well recognised (and recognised in the Dereham Transport Study 2016 (DTS)) that Dereham's congestion issues are mainly as a result of people accessing services with Saturdays being as critical as weekdays. The DTS recognised that due to Dereham's status as a service centre, any potential housing growth anywhere in Dereham would negatively impact on the Tavern Lane Junctions, which is not the assumption used in the DNIS.
- 2) Using the DNIS as the basis for identifying Dereham as a strategic growth area could be considered flawed due to the assumptions used in this study. If the DNIS is to be used to identify Dereham as a potential strategic growth point, then all three options in that study should continue to be assessed as potential options.
- 3) Both the DNIS and the DTS identified that the Tavern Lane junctions would be well over their design capacities by 2037 with existing growth and would need major improvements to increase capacity; unfortunately the long term schemes identified in the DTS, were deemed to be undeliverable in the DNIS.
- 4) The Dereham Network Improvement Strategy stated that:

*“Using this database it is estimated that traffic levels during the AM and PM peak periods will increase by 30-31% by 2037 and on Saturday the level is expected to increase by 34%. Such an increase will apply additional stress to the already congested highway network in Dereham, in particular to the previously identified key junctions near the central A47 interchange. This traffic growth will exacerbate delays and queuing along Yaxham Road, increasing the likelihood of exit blocking at other nearby junctions. It is likely that background traffic growth between 2017 and 2037 will be such that intervention would be needed if the additional demand is to be accommodated”.*

The first question that needs to be asked, when considering any growth anywhere in Dereham is whether there is a feasible option to either increase capacity at the Tavern Lane junctions by more than 34% or divert 34% of traffic away from Tavern Lane. Until such a scheme can be identified any potential allocation may be premature.

While the Town Council recognises and supports the need for a robust 5 year housing land supply, it is felt rushing into the creation of any strategic growth option is not the right move and more planning and consultation needs to take place in the first instance.

### Comparing the two strategic site options that could impact on Dereham.

Issues.	Robertson Barracks	Dereham Strategic Site (South and West)
Policy Gen 01	Brown Field – already developed difficult to refuse.	Green Field
Morning and evening traffic associated with trips to junior schools	No impact on Dereham. Junior schools near to site with room to expand	<u>Significant impact.</u> Most of the sites are some distance from the junior schools. Schools will not be provided on site because population projections suggest that Dereham under 16 population will remain the same over the plan period and the existing schools have room to expand.
Morning traffic, High School	Minimum impact – the site is more than three miles from school therefore NCC will provide bus.	<u>Significant impact</u> – most sites too far from high schools for walking. Current CR13 does not extend to high schools and has limitations in places for less confident cyclist.
Work traffic	Negative for people working in Dereham – too distant to walk	Negative for people working in Dereham – too distant to walk. Potential to cycle if infrastructure in place.
Town Centre shopping	Significant additional traffic	Significant additional traffic
Tavern Lane and supermarkets	Significant additional traffic	Significant additional traffic
Traffic diverted due to link road	None - no impact	No evidence to demonstrate that a link road will divert more traffic away from the Tavern Lane junctions than it will generate.

Open space.	Neutral – will neither deliver nor create a demand in Dereham	Could address shortfall in open space and formal sports pitches, and provide significant amount of accessible natural green space.
Location	Neutral – some services located in SM, including Doctor’s Surgery and junior schools	All housing would look to Dereham for provision of services. Much of the proposal is in the wrong parish, a Community Governance Review should be factored into any proposal.
Services	Not known	Much of the housing to the SW of Dereham will be well outside the reasonable walking distance to services. This will become a ‘services desert’.

It is quite possible that non of the strategic growth options meet the requirements of NPPF 109, “*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.***” [emphasis added] All of the sites proposed are away from employment sites and of such a distance from most services that walking would not be a reasonable option for most people, households would be reliant on the private car for most of their needs.

**Page 54 SDP 02: Strategic Development Policy Option 2 Dereham.**

It is stated that the Transport Assessment will require improvements to the Tavern Lane Junction and improved cycling and walking opportunities. For the potential of nearly 2,500 houses Dereham Town Council would expect to see something much more certain. The last Local Plan promised long term improvements to Tavern Lane junctions, but these were later deemed undeliverable.

The suggestion that the strategic allocation would deliver ‘improvements to cycling and walking opportunities’, does not feel sufficiently robust to deliver any meaningful improvements. The Town Council would like to see a comprehensive walking and cycling strategy which by 2036 will deliver a comprehensive coherent cycle network which allows less confident cyclists to cycle to high schools, town centre and leisure activities.

In the proposal put forward as part of the call for sites, there was a significant piece of public open space identified as a ‘country park’. This needs to be included as being delivered through the policy allocation, it seems to be omitted in the Preferred Options.

It seems contradictory that small scale development of a few houses being delivered through policy HOU 09 must offer a range of services and facilities with good accessibility on foot and cycle, but a Strategic Urban Extension with thousands of houses does not need to demonstrate good accessibility on foot and cycle.

d) Contribution to open space etc.

Policy ENV12 requires a specific type of open space - Outdoor Playing Space. The term "open space" should be replaced with "outdoor playing space".

Provision of Sports pitches - This should be delivered on land around the established sports club in Toftwood. This club is well established and well supported by the local community. It would be highly beneficial for the land for sport to be handed over to the Town Council as soon as the Local Plan is approved, rather than having to wait 15+ years to start enjoying the benefit.

The second to last paragraph sounds as though it has been decided that this strategic proposal is going ahead whatever. The Town Council would like to see more information relating to all the options before the SW option is adopted as policy.

**Page 65 - HOU 05 Large scale site development principles,**

- a) How does building bungalows fit with the aspiration to make best use of land as a finite resource? There is concern that such a stipulation could reduce viability and reduce the ability to deliver affordable housing for young families – under HOU-20 there is already a requirement for 5% of new buildings to meet the M4(3) standard. Stipulating bungalows is too prescriptive, there could be a range of options available to meet the differing needs of people with mobility impairments, HOU 20 seems to deal with this.

**Summary:**

- 1) More considerations should be given to developing the strategic growth option before it is included in the local plan.
- 2) As part of the consideration for growth, the South West extension option should also be given consideration, and part of the transport assessment if this is to be a plan with strategic growth options.
- 3) A comprehensive walking and cycling strategy needs to be identified at the outset.
- 4) If the South west option is included, then sport pitch provision needs to be handed to the Town Council once the Plan is adopted.
- 5) For the southwest option, the Country Park identified in the call for sites, needs to be included as part of the policy.
- 6) There needs to be a cycle lane added to the bridge on Westfield Lane.



**Page 67 HOU 06 Windfall Housing Development.**

This seems to say that any application for houses adjacent to the 'built form' of a town will be considered acceptable. (The Policy initially talks about towns in the title then talks about villages, this might be a typo.)

This seems to be saying that any development proposal on the edge of a town will probably be approved. Which edge? The edge as it is now or the edge as it is at the time of the application? Without a settlement boundary, the 'built form' is going to spread out during the plan period. A settlement boundary which defines 'built form' removes this complication.

The Town Council feels that without a settlement boundary there isn't any meaningful development control. It would be better to have sites allocated than rely on windfall sites. It might be better to look again at the Call for Site submissions to see if the numbers needed can be made up through allocation rather than windfalls.

The NPPF para 70 (d) states that Local Plans should have policies to support windfall sites within existing settlements. HOU 06 encourages windfall sites adjacent to the existing settlement, this policy is not therefore required for the Plan to be compliant with the NPPF.

The Town Council objects to this Policy as it has been worded as there does not seem to be any limit or control of the size of any individual site or the total number of sites over the plan period.

At criteria (e) (page 68) the sentence after "open Space" needs to be completed to avoid the suggestion that open space within the built form could be used as windfall sites.

**Page 70 - HOU 7 - Small Scale Housing Development in Small Villages.**

Many of these smaller villages will not be on mains sewage. Those developments that are not on mains sewage could have a negative impact on nutrient levels in water courses. To avoid the nutrient neutrality impact, how will this be addressed.

**Page 79 HOU 11 Single plot exception sites.**

- There seems to be no cap on the number. This could lead to uncontrolled development.
- What does a strong connection mean?
- People with disabilities not be in locations with limited or no community facilities or bus services. Should HOU 09 (a) also apply to this policy?
- What types of long-term disability are being considered? Is mental health being included?
- Under Part b – 'to meet a locally agreed specific need for people with long term disabilities or for a veteran'. The Council was not sure why veterans have been singled out. The definition of a veteran is clear and includes a very wide range of people, from somebody who has received 1 day's pay in the Armed Forces to a Brigadier. The Council feels that the specific needs of veterans could be adequately covered under disability.

There needs to be a set of clear criteria by which somebody's disability would be judged eligible. The Council felt such criteria should be confirmed by a health professional rather than have somebody's personal health condition discussed by a committee.

Protecting these houses in perpetuity as affordable by restricting Permitted Development Rights doesn't provide strong protection.

#### **Page 85 HOU 13 Self Build and Custom Built Homes**

The Council felt that there should not be a separate policy as the need for self-build is being addressed in other policies. The lack of restrictions on the policy, as proposed, gives concern.

#### **Page 110 HOU 23: Residential Development on Backland and Garden sites.**

While most of the policy deals with development in gardens and on 'backland' within the supporting statements at 5.151 and 5.152, there is reference to "green spaces", "residential amenity spaces" and "communal amenity green spaces". Such areas are usually public open spaces and should be dealt with under open spaces policies. NPPF 72 only deals with development of residential gardens.

Applications for backland and garden development nearly always meet with significant objections from neighbouring property owners and cause significant anxiety to neighbouring residents.

Councillors are concerned that having a policy, as set out, will lead to applications being decided by a planning officer rather than the planning committee. The Town Council feels that because of the unique nature of each application, this type of development should always be heard by the planning committee and not be delegated to officers.

Under criterion (b) in the policy, any proposal should not cause "unacceptable harm". The word "unacceptable" is not used in NPPF 72, only "harm". This criteria should be reworded removing the word "unacceptable".

One aspect which needs to be considered is the need to ensure that neighbours are not over shadowed by the development. There needs to be a criterion which includes not causing over shadowing of the neighbouring properties and gardens.

#### **Page 114 HOU 24: Affordable Housing**

The policy is suggesting 25% of developments with 11 or more houses should be affordable. The HEDNA assessment identified the need for 299 affordable units per year or 45% of all developments, with 90% of these being social and affordable rented.

The Town Council recognises that this level of affordable housing would not be possible, however NPPF 65 does allow for affordable units to be delivered on developments of 5 or fewer in rural areas.

The Local Plan therefore does not need to have a threshold of delivering affordable homes on developments of 11 or more properties, in rural areas it could justify policies for the provision of affordable dwellings on developments of 5 or fewer properties. This would help address the deficit of affordable housing in rural areas.

**Page 122 para 6.5 – Employment land and opportunities for growth.**

- Shipdham Airfield is not in the A11 corridor.
- The Town Council felt that there would be benefit in small scale employment exception sites.
- The Town Council expressed concerns that as part of the current housing allocation a large employment site on Shidham Road will be lost, and
- The current allocation of employment land to the rear of Elizabeth House still has no access to a Highway.

For historical reasons, Breckland has large employment sites away from residential areas, these have had the benefit of enabling industries which would not be well suited close to a residential area. The local plan should ensure a balance of employment land with employment land close to residential areas as well as employment land suitable for class E(g)(iii) further away from residential areas.

**Page 157 EC08: Tourist Accommodation – Camping, Caravaning and Holiday Lets.**

The Council is inclined to suggest that this policy be split into two policies. There could be small scale low impact camping sites with composting toilets, simple shower block etc, which only operate for a limited period a year. Such development would have limited impact and would not lead to an urbanisation of the countryside . Holiday lets, along with more intrusive and permanent types of tourist accommodation, on the other hand, should be more tightly controlled, as these could lead to urbanisation of the countryside.

**Page 158 The Environment, Climate Change and Managing Resources.**

Para 8.5 – Dereham Town council found the statistics that indicate there will be a significant deficit in water supply during the plan period quite alarming. The Town Council felt that policy ENV 01 should better reflect this situation and require some provision for rain water harvesting in the policy. It must be preferable to address the predicted deficit in drinking water, during the plan period, through rainwater harvesting rather than constructing desalination plants.

Dereham Town Council feels that climate responsive design Policy ENV 01 does not adequately address the climate emergency nor the drinking water emergency, the Policy should require all properties to include photovoltaic panels and rainwater harvesting.

Paragraph 8.11. Most of Breckland’s greenhouse gas emissions are derived from transport. It states that to reduce carbon emissions at a strategic level it will locate development where it can access service without the use of a private car. There has been no evidence presented to demonstrate that the preferred options for development are the best option for minimising travel by the private car. As already stated, the strategic site options are outside the reasonable walking distance to most services. Alongside this, some of the main employment sites are located well away from residential areas, on sites than can only reasonably be accessed by a private car.

### **Page 201 Open Space.**

8.115 – We have not seen any clear legal definition for a ‘public garden’. It might be helpful to have a definition, something like; “public garden” includes land which is laid out to grass or paved with the purpose being for the enjoyment by the public for air, exercise or visual amenity.

Allotments are not ‘open space’, they are private spaces. It might start to dilute the meaning of ‘open space’ if they are included. Allotments and community gardens are however valuable and provide meaningful outdoor recreation. There might be some merit through discussion with the Parish Council that allotments could be provided in lieu of open space provision. In terms of protection, most allotments are Statutory Allotments and are already protected, requiring Secretary of State approval for disposal after demonstrating that there are surplus allotments in the area.

### **Page 203 ENV12: Open Space, Sport and Recreation.**

- The first sentence should be removed and replaced with the definition of Open Space in paragraph 8.115.
- In the second sentence, the word “designated” should be removed. If it is going to remain then the Parish Council’s need an opportunity to review what is and what is not ‘designated’ open space.
- Under paragraph (a) after “recreational” replace “or” with ‘and’. Then “settlement” should be followed by – “and that any loss will not result in localities within the settlement not meeting the FiT walking distance standards for accessing the type of open space being lost”.

### **New provision –**

There has been an ongoing problem with developments coming forward and misunderstanding the existing Policy. Developers have interpreted the policy as the need to provide ‘general open space’ and included road side verges as counting towards their open space provision, rather than providing the specific type of open space - ‘Outdoor Playing Space’. This has often led to the Town Council challenging developments and delaying the granting of planning consent.

It would speed up planning decisions, and be more compliant with NPPF 16(d) if the following suggestions could be adopted.

- Re-title - Change from ‘New Provision’ to ‘Provision of new outdoor Playing Space’
- The presumption that developments of 25 dwellings or more would provide outdoor playing space on site, gives the option for developments of less than 25 dwellings not to provide outdoor playing space on site. Where this 25 property threshold came from is unclear, it is however included in the Open Space Policy in the 1996 Local Plan, where the justification given, was that the cost of maintaining small areas of open space was uneconomic. This was at a time when Breckland Council would have been the authority adopting and maintaining outdoor playing spaces. Outdoor playing spaces are now fully the responsibility of the parish councils, therefore the parish councils should be consulted on this threshold on a case by case basis.
- It is not accepted that developments of between 11 and 24 dwellings would not provide a meaningful amount of outdoor playing space on a site. A development of 11 houses

would be required to deliver around 600sqm of outdoor playing space. Fields in Trust (FiT) set the minimum size of a Local Area for Play (LAP) as 100sqm, the minimum area for a Local Equipped Area for Play (LEAP) is 400sqm and the minimum area for a Neighbourhood Equipped Area for Play (NEAP) is 1000sqm. That is not to say that equipped play areas should always be provided, but this does demonstrate that a meaningful area of outdoor playing space could be provided for developments of 11 properties and above.

The plan below demarcates 600sqm within the red line – it may be a small play area but it is better than no play area at all.



The policy may be better worded to read:

All new residential developments of 11 or more dwellings will be expected to provide outdoor playing space equivalent to 2.56 hectares per 1,000 population, which equates to 25.6 m<sup>2</sup> of outdoor playing space per person. It is expected that this will be provided onsite due to the importance of the mental and physical health benefits of having communal open spaces close to where people live.

While the policy deals with outdoor playing space, there should also be recognition of other types of outdoor communal space which are needed but may not relate to children. For example, a development for a care home for adults may not need an outdoor playing space, but other outdoor green space will be beneficial for people's wellbeing. There needs to be recognition in the policy that even if the development is unlikely to require children's playing space, it should still provide 25.6 m<sup>2</sup> of outdoor communal green space. In a care home setting, it might be more appropriate to provide this space as private space as opposed to public open space.

Under 'New Provision', The third paragraph and the eighth paragraph cause confusion and need to be much clearer. Developers are often confused and avoid including an area for sports onsite because the area they are providing is not sufficient for a full size football pitch. People get benefit from any reasonably sized piece of open space to run around or play informal games.

The existing policy and this proposed policy (essentially the same) allow too many opportunities for developers to 'duck out' of providing all the outdoor playing space which the policy requires.

Suggested wording amendment.

For developments of less than 150 properties the outdoor play space should be laid out for children's play with space available for informal games. For developments of 150 properties and over the outdoor playing space should be laid out for play and more formal sporting activities in a ratio of 1:2 respectively.

All landscape master plans should clearly show types of open space with quantities. Types of open space are:

1. Playing space (required as part of the 25.6 sqm per person)
2. Areas for sport (required as part of the 25.6 sqm per person)
3. Amenity green space.
4. Roadside verge.

The Town Council has experienced many situations where developers have not delivered the correct amount of outdoor playing space in accordance with the policy. To avoid future issues, the Town Council requests that all developments put forward in the Local Plan are required to confirm, in writing, that they fully understand the requirement for the provision of outdoor playing space and to confirm that they will be able to provide the required quantity and quality of outdoor playing space as a minimum.

Where off-site provision is the only option, the commuted sum should include an element of land value, otherwise there is a financial incentive not to provide outdoor playing space onsite.

**Fourth paragraph** – Beginning "it is recognised that there may be cases..." after the word "location" replace "or" with "and". Then insert – "Any such contribution will need to be towards a specific deliverable scheme in consultation with the relevant Parish Council and the developer contributions in this document and will be secured through a section 106 agreement. If no suitable off-site scheme can be identified and agreed with the Parish Council, then provision will need to be made on site".

This last sentence avoids the problem encountered where developers have been less than helpful when trying to identify a scheme. There needs to be a positive incentive for the developer to agree to a reasonable alternative with the Parish Council; this could include the provision of allotments rather than outdoor playing space where local assessment and the Parish Council deem these to be a greater need than outdoor playing space.

Then remove paragraphs five and six.

**Page 213 DES 04 Encouraging active travel and mitigating the impact of vehicles.**

First sentence after “should identify” should be rewritten to read “safe and convenient walking and cycling routes to key local facilities and services, including schools”.

In relation to traffic calming measures – suggestion: state that situations where pedestrians and vehicles share the same road space will be the exception and only acceptable in cul-de-sacs of less than 5 properties. Where shared use road space is included, this should be brick weave rather than black tarmac. Black tarmac gives the impression that it is a space for cars not pedestrians, brick weave gives the impression of a pedestrian area.

**Page 230 Travel - paragraph 11.7**

Walking is the most popular form of active travel. The strategic proposals in Dereham and Swanton Morley place a considerable amount of housing well outside a reasonable walking distance of most services. This is contrary to NPPF 105 which states that “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”. If the Dereham strategic site goes forward, many of the properties will be reliant on a private car, so do not accord with the aspiration stated in 11.7.

Paragraph 11.12 – Include a sentence to the effect that when assessing cycle routes, industry recognised methods should be used to assess perceptions of safety.

Paragraph 11.13 – It should be recognised that Cycle Route 13 is a long distance cycle route. It is assessed as being suitable for people who are confident and experienced cyclists. Just because it is a Sustrans route does not mean that it is safe, suitable and convenient for less confident cyclists or children. An assessment will still need to be made of the entire length of any proposed cycle route even if it includes CR13.

**Page 232 INF 01: Sustainable Transport**

d. How have the sites proposed in the local plan been assessed in terms of their ability to reduce the need to travel by a private car and to give people a genuine choice of transport modes including walking and cycling (NPPF 105 and 109)?

At- f. Remove “seek to” make it an action rather than an aspiration.

At- g. Replace the word “promote” with “provide” to make it more active, then at the end of the sentence insert “to key services including high schools”

NPPF 108 is much more assertive with regards to sustainable transport and active travel, it states that “opportunities to promote walking, walking and public transport use **are identified and pursued**”. [emphasis added]

**Page 233 INF 02: Transport Requirements**

Last paragraph – After cycle routes insert “to key services including high schools”.

After “where transport impacts are identified” insert “or sections of a proposed cycle route are deemed to be unsuitable to less confident cyclists”. Then at the end of the paragraph

insert “the developer may need to make a contribution to any relevant cycle route improvements deemed necessary”.

**Page 241 INF 04 Renewable Energy Development**

While the first sentence states that the Council supports proposals for new renewable energy development, the strength of the support seems to stop at the end of the sentence! Wording could be adopted similar to the HOU 23 that such developments will be permitted where they do not cause unacceptable harm to the local landscape etc.

**NPPF 160.** States that:

To help increase the use and supply of renewable and low carbon energy and heat, **plans should:**

(a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);

(b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

(c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers

As the local plan has not identified suitable areas for low carbon energy sources it should set out a policy which is more encouraging. The Town Council recognises that in order to transition to a low carbon economy there will need to be some ‘pain’ in accommodating low carbon energy.

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At point - f. After “Pedestrian” insert “/cycling”