

BRECKLAND DISTRICT COUNCIL

Report of: Cllr Gordon Bambridge - Executive Member for Growth
To: Local Plan Working Group – 15 March 2017
Author: Stephen Ottewell – Director Planning and Building Control (Capita)
Subject: Development Strategy for Dereham
Purpose: The purpose of this report is to consider the development strategy for Dereham (development levels and sites) to be included with the Local Plan

Recommendation(s):

It is recommended that Members agree Option 2 to support the approach towards Dereham as the basis of preparing the final iteration of the Local Plan (development levels and sites), and recommend to Cabinet that:

- The Council work with the Town Council and Norfolk County Council outside the Local Plan process to undertake additional transport modelling to inform mitigations for existing and potential future pressures not related to development.
- The Council work with the Town Council to develop its long term vision and aspirations for Dereham beyond the current proposed Local Plan.

1. INTRODUCTION

- 1.1 The purpose of this report is to explore the issues relating to the development strategy for Dereham as proposed in the emerging Local Plan. Firstly we would wish to emphasise it is recognised by the Council that there are local concerns about the existing problems relating to transport in Dereham. However it should be noted that the role of the Local Plan is not to remedy existing deficits that may have arisen due to previous decisions or lack of investment, nor can development be expected to meet underlying background growth due to changes in the broader economy and people's habits. These are matters that need to be pursued in partnership outside of the Local Plan and the Council is committed to working with partners to take these matters forward.
- 1.2 In order to ensure that the timescales for publication (Reg 19) and submission as set out in the Local Development Scheme are not delayed, and that the Council can maximise its influence on and contributions from development, it is important that the approach to development levels and locations and supporting infrastructure are finalised. As outlined below, the Local Plan is required to be evidenced based and therefore while it is recognised there may be aspirations for the future of Dereham unless these are already well developed to the standard required, and they have been through the necessary processes they unfortunately cannot be considered as part of the current Local Plan. The development of proposals of significant scale require a number of years of work and that is prior to any delivery. Sites in Dereham (two) are expected to start being constructed within the first five years 2016/17-2020/21 (120 homes) with a further site delivering in the 2021/22 to 2025/26 of the plan (365 homes). These are therefore important to delivery of the plan in the early years. As members will be aware it is not possible to remove substantial quantities of growth from any one settlement without redistributing them to other locations and therefore if any significant reduction is made to Dereham this would need to be redistributed either to

Watton and Swaffham or to Local Service Centres. This would cause significant delay to the plan as additional work and consultation would be required with among others the resultant risk of exposure to unwanted development.

1.3 In considering the soundness of the overall planning strategy, the inspector who reviews the Local Plan will be looking at the following tests:

- Has it been positively prepared?
- Is it justified?
- Will it be effective?
- Is it consistent with national policy?

1.4 As such, the following sections of this report looks at each of these tests in turn.

2. **POSITIVELY PREPARED**

2.1 This test relates to whether or not the plan provides for the District's objectively assessed housing need and that this is distributed in such a way as to supportive wider economic growth.

2.2 The following table provides information to set the levels of development proposed in the Local Plan in its wider context (having regard to the population at the 2011 census). It looks at how the population was split across the district in 2011. It then looks at how the proposed housing growth is split across the district, allowing for a comparison of the two. It also looks at the projected population based on the assumption that each new dwellings is occupied by 2.3 residents, and how much the population will grow in each location between 2011 and 2036.

TABLE 1: POPULATION AND GROWTH ANALYSIS

Settlement	Population at 2001 Census	Population as %	Growth Proposed 2011-2036	Growth proposed as %	Dwellings represented as population (assume 2.3 people per dwelling)	Population increase from 2011 %
Attleborough	10482	8.03	4315	27.11	9924.5	48.63
Thetford	24340	18.65	3666	23.03	8431.8	25.73
Dereham	18609	14.26	1554	9.76	3574.2	16.11
Swaffham	7258	5.56	1545	9.71	3553.5	32.87
Watton	7202	5.52	1305	8.20	3001.5	29.42
Ashill	1411	1.08	91	0.57	209.3	12.92
Banham	1481	1.13	131	0.82	301.3	16.91
Bawdeswell	828	0.63	42	0.26	96.6	10.45
Garboldisham	969	0.74	43	0.27	98.9	9.26
Great Ellingham	1132	0.87	182	1.14	418.6	27.00
Harling	2142	1.64	212	1.33	487.6	18.54
Hockering	711	0.54	90	0.57	207	22.55
Kenninghall	941	0.72	68	0.43	156.4	14.25
Litcham	618	0.47	27	0.17	62.1	9.13
Mattishall	2617	2.01	163	1.02	374.9	12.53
Narborough	1094	0.84	147	0.92	338.1	23.61
Necton	1923	1.47	306	1.92	703.8	26.79
North Elmham	1433	1.10	94	0.59	216.2	13.11
Old Buckenham	1270	0.97	84	0.53	193.2	13.20
Shipdham	2057	1.58	271	1.70	623.3	23.25
Sporle	1011	0.77	69	0.43	158.7	13.57
Swanton Morley	2100	1.61	180	1.13	414	16.47
Weeting	1839	1.41	101	0.63	232.3	11.22
Rural Areas	37023	28.37	1232	7.74	2833.6	7.11
Total	130491	100	15918	100		

2.3 The table shows that for Dereham:

- Significantly larger than the other market towns of Swaffham and Watton by population at the start of the plan period (2011).
- The growth in Dereham, given it's size compared to the other market towns, is proportionately lower than Swaffham and Watton, and lower than many Local Service Centres.
- Dereham had approximately 14% of the population in 2011, and will have approximately 10% of the growth. For the other market towns the level of growth proposed is higher than the population (as a percentage comparison).

2.4 Looking at wider economic and demographic information contained with the Strategic Housing Market Assessment, In order to support economic development throughout the plan period (up to 2036), it is important that sufficient new housing is provided in areas of economic activity to allow for the maintenance of a local workforce to support local businesses.

- Dereham has a workplace population (see Figure 8 of the SHMA) of 8614, of which 54% live in the area (equivalent to 4650 people).
- Demographic projections (figure 27 in the SHMA) show that assuming a working age group of 20-64 that in 2012 represents 55% of the Breckland population. By 2036 the sub-national population projections show that this percentage will drop to 48% of the population. So in effect, although the adult population is growing overall by 19%, the working age population will remain static so in order to maintain the local economy through having sufficient working age population there needs to be housing growth.

3. **JUSTIFIED**

- 3.1 The proposed development strategy for Dereham was adjusted between the consultation on preferred directions (Jan 2016) and the subsequent consultation in the summer, and the Town Council have been critical of the lack of justification for this change.
- 3.2 As early as the preparation of the preferred directions consultation document the Council identified a desire for a level of growth across a network of Local Service Centres in the rural areas, as an important element of the settlement hierarchy (as informed by the sustainability appraisal process). Having regard to this figure, the rest of the housing target was directed to the larger market towns of Thetford, Attleborough, Dereham, Swaffham and Watton. In essence this was a bottom up approach which was considered to support “sustainable development” in the district – i.e a balance between economic, environmental and social factors.
- 3.3 Within the market towns the split of development was originally driven by the expected delivery rates on the two large SUEs in Attleborough and Thetford. Whilst those delivery forecasts of the SUEs had to be revised downwards even with lower development levels in the plan period in Thetford / Attleborough in the most recent consultation compared to the preferred directions, the strategy still represents a focus on Thetford /Attleborough and associated benefits around the A11 corridor (growth of 48% in Attleborough and 26% in Thetford respective) (see Table 1). It is important to note that there will still be significant development on the two SUEs in those locations beyond the plan period. At around 3000 units beyond plan period, even under the current housing target (597) this would equate to around 5 years housing supply if no development took place elsewhere. So the strategy continues to focus as much development as possible at the market town level of the hierarchy within the A11 corridor (as supported by the SA), whilst also ensuring that the approach is deliverable and can pass the effectiveness test (see following section).
- 3.4 The overall amount of development across the market towns level of the hierarchy remains the same. The levels of growth now proposed for Dereham is smaller than the Swaffham, Watton, and some Service Centre’s. The scale now proposed is arguably more proportionate to its size and function as a market town and will assist in maintaining a working age population.

4. **EFFECTIVE**

- 4.1 A critical test for the soundness of the Local Plan is that it can be delivered and so will be effective. The process has therefore considered for each place the realistic delivery of sites and the trajectories are based on the information available to the Council. This will be further developed in the SA to support the publication plan with reference to issues contained within the IDP.
- 4.2 For the purposes of considering the effectiveness of the Local Plan strategy, the focus is on whether the proposed level of development can be achieved having regard to the impact upon existing infrastructure and mitigation. For Dereham, the specific challenge which will be posed by the inspector is whether or not the impacts arising from the level of development proposed can be mitigated. The evidence addressing this is contained in various studies which are summarised below (with cross-referencing).

4.3 *Transport*

4.3.1 As members will recall, consultants White Young Green (WYG) were commissioned by Breckland Council to carry out a study of the transport impacts of proposed and potential land used developments in Dereham and the surrounding area.

4.3.2 The study provides clear evidence that the quantum of development as proposed for Dereham can occur with suitable mitigations to prevent unacceptable consequences occurring on the highway network. Recent correspondence from the County Council confirms that (my emphasis in bold):

- The County Council has not raised any Highway objections to the scale of growth promoted in Dereham through the Local Plan Process. In arriving at this position consideration has been given to the findings of the Dereham Transport Study.
- Interpretation of the Dereham Transport Study in the context of the Local Plan is that the work has identified that there will be impacts at Tavern Lane and other junctions as a result of the cumulative effects of the scale of growth proposed in the Local Plan....the work has shown there will be impacts from growth on other parts of the local road network and these will need to be mitigated through development proposals.
- The study, although not specifically produced to assist with the consideration of planning applications is evidence that shows the need for improvements at other junctions and it is expected that applications considered in advance of the Local Plan adoption should consider their impacts and propose suitable mitigation.
- **In summary, the Dereham Transport Study has provided evidence for the Local Plan process to show that the principle of the scale of growth and allocations is sound provided that highway mitigation is made to the network and the need for development to provide that mitigation is included in policy wording of the Local Plan.**

4.3.3 This is a similar and consistent message with the detailed Transport Assessments which are being prepared to support the major applications that have been submitted in Dereham that are currently under consideration.

4.3.4 The Transport Assessments supporting these applications find similar issues with the local highway network as the Dereham Transport Study. These applications provide a package of improvement measures that have been agreed by Norfolk County Council to mitigate their impact. The Assessments have had regard to the cumulative impact of developments elsewhere in Dereham in their findings. As such, the scale of the measures sought have been considered necessary but would not preclude any longer term options that may be developed between the Town Council, District Council and County Council outside of the Local Plan process.

4.3.5 Following its publication alongside the preferred sites consultation, various comments have been received in response to the contents of the Transport Study. In order to provide further clarity around the issues raised, WYG were asked to prepare an addendum report and make recommendations about further study work that may be required either to support the Local Plan or via alternative channels. The full Addendum report is attached as **Appendix A**.

4.3.6 The initial scope was designed and agreed with the Highway Authority to assess the key junctions at the busiest times. Weekday peaks are generally considered to be the worst case for the throughput of traffic and congestion so the data collection was targeted at these times. Due to the concerns raised about the lack of capacity on a Saturday data has been collected that shows the variation in traffic flow at a number of links on the network

across a whole week, in order to quantify the differences between weekday and weekend traffic volumes. Surveys were carried out on 7 of the key links in the town that feed into the busiest part of the road network to the south of the town centre (Yaxham Road (3 survey sites), South Green Road, Station Road the A47 slip roads).

4.3.7 Based on the information, the main conclusions to be drawn from the data are:

- Total traffic volumes across the whole day on a Saturday were approximately 90% of the average weekday volume
- With regards to peak hour traffic volumes, half of the volumes were significantly higher on a weekday than on Saturdays (7 of 14 links), 5 had similar volumes and 2 had significantly higher traffic volumes – these were on Station Road Northbound and Yaxham Road Southbound, south of Greens Road heading towards the Tesco Roundabout.
- However, when traffic entering the Tesco roundabout is combined it shows that the weekday peak is higher than Saturday because of the higher volumes of traffic using the roundabout from the A47 slip road and Yaxham road to the south. The combined traffic volumes (see Figure 18 of the report) reduce the effect of all the variations between times of day, survey sites and directions to provide an overall comparison of each day of the week – showing that the Saturday peak is lower than both weekday peaks.

4.3.8 On this basis WYG recommend that the weekday junction capacity assessments that were carried out in the Local Plan Transport Study are an adequate base from which to develop mitigation measures for the additional traffic that will be generated by the proposed development.

4.3.9 Where evidence has identified underlying issues, as the Dereham Transport Study has done, then the Council would wish to work with key stakeholders – such as the Town Council and Norfolk County Council– to prepare further research – such as an area-wide transport model – which is capable of increasing the profile of the issue and identifying medium term mitigations with the aim of securing additional funding for a more transformational highways solution which could also allow for longer term growth.

4.4 *Education*

4.4.1 Recent correspondence from County Council (which will be included in our duty to cooperate statements) has confirmed that there are no show-stoppers from the County Council in relation to either the Local Plan and/or the current round of applications in Dereham and there is no requirement for a new primary school (and land to deliver). More specifically the current applications proposed the following measures:

- **Swanton Road 2015/1487 (8/2/16).** Contributions required in accordance with standard multipliers to be used to fund the following projects:
 - a. King's Park Infant School – contribute to extension to increase capacity of school;
 - b. Dereham Infant School - contribute to extension to increase capacity of school;
 - c. Grove House Nursery and Infant School - contribute to extension to increase capacity of school;
 - d. Dereham C of E Junior Academy – contribute to extension to increase capacity of school;
 - e. Dereham 6th Form Centre – contribute to internal improvements to increase capacity of school.

- **Shipdham / Westfields Road 2015/1490 (made 1/2/16).** The Infant and Junior schools are now deemed full, and Norfolk County Council would therefore seek contributions for this development for the Infant and Junior schools and the Dereham 6th Form Centre as follows to contribute towards extensions:

- Toftwood Infant School: £11,644 x 36 = £419,184
- Toftwood Junior School: £11,644 x 40 = £465,760
- Dereham 6th Form Centre: £19,029 x 5 = £95,145
- Total education contributions £980,089

4.4.2 NCC thus did not object to the proposals subject to contributions being made to support the expansion of local schools.

4.5 *Water / Waste Water*

4.5.1 In relation to WwTWs the study has shown a workable solution that the EA and AWS signed up to and it concludes that the level of growth in the plan is deliverable, albeit with caveats around the ongoing need to discuss applications on a case by case basis between Breckland, AWS and EA (at which time AWS may suggest different solutions as sites come forward – these solutions don't have to match those at a strategic level in the WCS, because ultimately, it is up to AWS to decide how to deal with each site in conjunction with regulatory approval from the EA).

4.5.2 Regarding Dereham the study shows that there is capacity at Bylaugh WwTW (serving Swanton Morley) to accept allocated growth in the catchment + further growth (approx. a further 1,100 homes) so in theory, a significant proportion of growth from Dereham could be transferred there; but, it would need a pipeline as a longer term solution and/or tankering.

4.6 *Health*

4.6.1 At present, 3 of the 4 GP practices in the Dereham locality are operating closed lists, therefore not accepting new patients. The problems do not relate solely to the population levels but also to difficulties in recruitment of G.P's and practice nurses (a Norfolk wide issue), the increasing demand on primary care services by the general public and some primary care services not being fit for primary care provision. New development in Dereham can only mitigate the demand placed by new residents, rather than addressing existing deficiencies in service provision.

4.6.2 In terms of mitigating the impact of growth, solutions centre around improving the existing primary care premises to a modern standard, in some cases to provide extensions to the facilities. South Norfolk CCG are currently defining the projects for extensions and improvements to the existing 3 surgeries in Dereham, including:

- **Orchard Surgery;**
- **Theatre Royal Surgery;**
- **Toftwood Surgery**

4.6.3 The specific scope of the projects and costs are currently being determined and would be partly or wholly funded by S106 agreements for major application sites in Dereham. Communication will remain open with the CCG as the Local Plan progresses and for any subsequent permitted planning applications, to ensure that funding is secured where required to mitigate the impact of new development on local health facilities.

5. CONSISTENT WITH NATIONAL POLICY

- 5.1 A fundamental element of national policy is that the Local Plan provides for a rolling 5 year supply of housing land.
- 5.2 At this point in time, the five year housing land supply requirement includes the need for a 20% buffer on land supply to take into account past under delivery. The five year land supply data has been taken from the September statement which splits past undersupply over the remainder of the plan period (Liverpool methodology). 2011 to 2016 shortfall in delivery is 654 dwellings. The annualised supply is therefore 747 dwellings. This is achieved by OAN (597) + 20% buffer + past under delivery (32). For simplicity the base data has been taken as 30th September. Whilst additional permissions have occurred since then these have not been included as the trajectory work for the five year housing land supply was considered to be the most robust starting position.

TABLE 2: HOUSING LAND SUPPLY

Settlement	Dwelling Numbers	16/17	17/18	18/19	19/20	20/21
Attleborough SUE	2650				100	150
Thetford SUE	3250				100	150
Dereham Allocations	750		20	20	30	50
Swaffham Allocations	706		11	25	100	180
Watton Allocation	454	9	70	80	102	85
Local Service Centre Allocations	785	7	28	45	130	140
Rural Areas	150		6	8	8	8
Extant Large Sites from 5YHLS	2942	234	606	765	635	367
Extant Small Sites from 5YHLS	612	122	122	122	123	123
Total		372	863	1065	1328	1253
Five Year Total		4881				
Five Year Housing Land Supply Requirement +20%		3735				
Surplus		1146				

- 5.3 This demonstrates that in order to preserve the 5 year supply in early years of the plan (16/17 and 17/18), it is necessary to identify allocations which can come forward in the near future – given that the existing allocations are only identified to provide 16 units in 16/17 and 129 units in 17/18 against an annual target on 747 and an expected delivery of existing permissions that is lower than this figure during both years. Clearly early delivery of larger allocations within the market towns is necessary to safeguard the five year land supply and prevent further development on sites not identified within the Local Plan.

6. SITES

- 6.1 The preferred sites and settlement boundaries consultation in September/October 2016 identified five sites which would accommodate the 750 dwellings requirement for Dereham. These were as follows:

Site Reference	Number of Dwellings
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LP[025]007: Land to the west of Etling View	60
LP[025]011: Land to the west of Shipdham Road	130
LP[025]023: Land off Swanton Road	210
LP[025]029: Land to the rear of Dereham Hospital	60
LP[025]030: Land to the east of Shipdham Road	290
Total	750

6.2 Three of these sites (LP[025]007, LP[025]023, and LP[025]030) are currently the subject of live planning applications, which are being determined through the development management process. Sites LP[025]011 and LP[025]029 are not the subject of planning applications at the present time. During the consultation 138 comments were received on the Dereham sites from 61 consultees. The greatest number of comments were received against site LP[025]030, which is recommended for 290 dwellings. Through the consultation no statutory agency objections were received to the preferred sites which would bring into question their deliverability or suitability through the Local Plan.

6.3 Since the consultation occurred a further site for 48 dwellings off Greenfields Road in Dereham has received a decision to grant planning permission subject to a legal agreement. With existing commitments this would lead to an increase in the total number of dwellings by 62 dwellings and creating a total allocation of 812. It would therefore be possible to reduce the allocation in Dereham by 60 dwellings and still meet the proposed housing target for the town. Any decision for the removal of a site should be on the basis of the sustainability appraisal, ensuring that the most sustainable and deliverable sites remain within the Local Plan to support the town's growth.

7. OPTIONS

7.1 There are three options available:

- Option 1 – Accept the development strategy approach towards Dereham as the basis of preparing the final iteration of the Local Plan (development levels and sites)
- Option 2 – Accept the development strategy support the approach towards Dereham as the basis of preparing the final iteration of the Local Plan (development levels and sites), and also recommend to Cabinet that:
 - The Council work with the Town Council and Norfolk County Council outside the Local Plan process to undertake additional transport modelling to inform mitigations for existing and potential future pressures not related to development.
 - The Council work with the Town Council to develop its long term vision and aspirations for Dereham beyond the current proposed Local Plan.
- Option 3 – Reject the development strategy

8. REASONS FOR RECOMMENDATION(S)

8.1 It is recommended that Members endorse option 1 or 2 to accept the development strategy as this is necessary and most appropriate basis to progress the Local Plan. Having an up to date Local Plan is important to ensuring and maintaining a five year land supply and to shaping the District. The government has clearly indicated that it expects Council's to have an up to date Local Plan.

8.2 The Local Plan by its nature does not and cannot deal with all the issues that are affecting Dereham and therefore as part of its commitment to enabling our market towns to thrive the Council should work with the Town Council and Norfolk County Council to find solutions to the local concerns about traffic. It is also important that for the long term a vision is developed and shared by all to enable the aspirations for Dereham to be delivered in the best way possible. It is therefore recommended that members endorse option 2.

8.3 Should members decide not to endorse the development strategy, or to require further work prior to endorsement, then the timetable for the Local Plan will be substantially delayed.

9.0 EXPECTED BENEFITS

9.1 The benefit of endorsing option 1 or 2 is that it allows the Local Plan to progress on the basis of a strategy which is sound – that is justified, effective, in line with national policy and positively planned.

10.0 IMPLICATIONS

10.1 Corporate Priorities

10.1.1 The Local Plan aligns with corporate priorities: Supporting Breckland to develop and thrive; providing the right services at the right time and in the right way; developing the local economy to be vibrant with continued growth and enabling stronger, more independent communities. The production also aligns with the priority of enabling effective planning and delivery of housing solutions to meet local needs.

11.0 WARDS/COMMUNITIES AFFECTED

11.1 All wards in Breckland will be affected by the Local Plan

12.0 ACRONYMS

12.1 WYG – White Young Green
OAN – Objective Assessment of Need

Background papers:

Lead Contact Officer

Name and Post: Steve Ottewell, Email: stephen.ottewell@urbanvision.org.uk

Key Decision: No

Exempt Decision: No

This report refers to a Mandatory Service

Appendices attached to this report:

Appendix A Dereham Transport Study Addendum Report