

Dereham Town Council

2nd December 2014

At an additional meeting of Full Council held on the 2nd December 2014 in the Assembly Rooms at 7.30pm

Present. Councillors T.Birt (Chairman), S. Green, K. Millbank, A. Bowyer, R. Hambidge, P. Duigan, L. Monument, T.Monument

Also in attendance: Town Clerk A Needham

104. To receive apologies for absence:

Apologies for absence were received from Councillors L.Goreham, R.Goreham, H.Rogers and M.Fanthorpe.

105. Declaration of interests.

The Clerk informed the meeting that he was advising a friend on the piece of land in Swanton Morley.

106. To consider the Issues and Options of Breckland Council's Local Plan.

Proposed by Councillor P Duigan seconded by Councillor T Birt, it was then agreed to suspend Standing Orders as it relates to debate and to operate under Committee debating rules.

Councillor Birt proposed that the Council should make a statement regarding its position on development in general which would form a clear position statement formed from a synopsis of general comments from previous Council meetings:

Councillor Birt proposed the following position statement:

The Town Council want Dereham to thrive and be a successful Town. We aspire to see good sustainable development working towards a Town which is self-sustained in terms of jobs and services. The Town Council is not opposed to increased growth provided that additional growth does not adversely affect the quality of life of existing residents.

This was seconded by Councillor Hambidge and agreed.

In considering the Issues and Options Consultation Document.

Before considering the Issues and Options, Councillor Birt presented the findings of a recent study from the Office of National Statistics which highlighted the impact on personal wellbeing of commuting long distances to work. The study demonstrated that commuting by more than 30 minutes by bus could have adverse effects on individual wellbeing and long term health. [http://www.ons.gov.uk/ons/dcp171766_351954.pdf]

(The Town Council then worked through the most significant questions from Dereham's viewpoint, considering the Issues and Options Document and other information and statistics provided for comparison purposes in their agenda pack. The following is a draft of Dereham Town Council's formal response to the questions listed).

ISSUES AND OPTIONS QUESTIONS AND REPLIES FROM DEREHAM TOWN COUNCIL 2.12.2014

Question 1

What do you think Sustainable development means for Breckland?

In order to be sustainable (amongst other factors):

- The Jobs and the population needs to be balanced. The aim should be that there is a transition between net out -commuting of the workforce to being self-sufficient in jobs.
- There needs to be a broad range of jobs for a wide range of skills particularly increasing the balance between low skilled and high skilled jobs.
- There needs to be a wide mix of housing types
- There needs to be development across Breckland in the villages as well as the towns.

Justification

Commuting levels have increased in the last 10 years. Commuting contributes significantly to global warming. Fuel costs are set to increase faster than incomes, therefore in order to maintain the standard of living of the residents, options for working locally need to be created. The concentration of jobs in Breckland, as a proportion of the working age population, has decreased from 0.7 to 0.65 between 2001 and 2011. Over the last 10 years unemployment in Dereham has increased faster than the national average. These trends are unsustainable.

Question 2

Do you have any views which should be included in our vision?

The vision is fine but the subsequent objectives and policies don't seem to be capable of delivering vision.

Option 1

Proposed Strategic Objectives.

The District Council has a duty to all the areas of the District not just the A11 corridor. The economic data indicates that Dereham is suffering from a higher level of unemployment than Thetford.

Each market town area should develop in order to provide sustainable employment rather than just a focus on A11 corridor.

Question 3

Do you think the objectives are relevant?

Each of the market town areas (encompassing hinterland) should be positively developed towards being self-sustainable in jobs and services.

If economic development is concentrated along the A11 corridor, there is a risk that other market towns will see housing growth without jobs growth. This could lead to high levels of commuting and higher unemployment rates.

Question 4

Option 2 is the preferred option, however both options could set too long a time frame. Population projections are notoriously inaccurate, and based on many assumptions.

It is very difficult to predict future population growth and jobs growth and household needs. The ONS only project population growth to 2021.

The population projections cannot take account of any future political changes. For example because Breckland's population growth in recent years has been largely due to national and international migration any political changes to reduce international/European migration would have a big impact on the need for housing.

In accordance with suggestions from the Royal Town Planning Institute in January 2014, the Local Plans should:

- Be flexible enough to accommodate the potential range of outcomes.
- Be monitored to see what is actually happening and be ready to adjust the plan.

Housing

Issue 1 – Growth Scenarios.

Why do houses need to be built in Breckland? From the Breckland Council Strategic Housing Market Assessment 2013.

Average annual population changes 2001-2010

	number	balance
births	642	
deaths	1414	-772
flow in from rest of UK	6232	
Flow out from rest of UK	5373	859
International migration in	1290	
International migration out	382	908
total		995

In Breckland annually there are more deaths than births. Without any in-migration the population of the District would decline and, due to the ageing population, without an increase in population the working age population would reduce. However, there are currently far more people of working age than there are jobs. If there were no migration, either UK or international, then Breckland would only need around 68 dwellings per year.

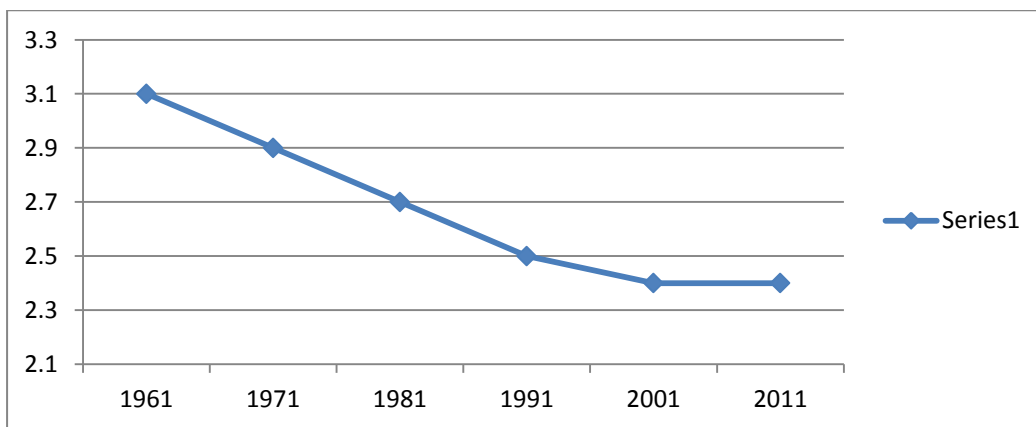
Housing Strategy

All the projected housing requirements seem to be based on the higher 'optimistic' housing needs. Two key assumptions seem to have been made. The first, and most important, assumption is that the size of households (number of people per household) would continue to decline. The Consultants seem to have used the decline between 1991 and 2011 and suggest that the fact that the size of households did not decrease between 2001 and 2011 is due to the recession and that the long term trend would continue down to 2.1 persons per household in 2032. The assumption that household size will continue to decline at the same rate forever is clearly nonsense, at some point it has to level off. The argument that the reason that numbers of people per household did not decline between 2001 and 2011 is due to the recession has not been proven, an assumption has been made. The recession did not really start until the latter end of this period so it is doubtful that it will have had such a large effect on household sizes.

If the longer term trend in household sizes is considered over a longer period from 1961 then the levelling out between 2001 and 2011 seems like a natural adjustment and it is just as likely that average household sizes will continue at the 2011 level. Another way of checking the validity of Breckland's assumption that average household sizes would decrease down to an average of 2.1 persons per household, would be to look at the kind of places which currently have that demographic. The only local authority areas in England that have an average household size of 2.1 people or less are Islington, Kensington & Chelsea, Westminster and the City of London. It seems unlikely that Breckland's demographic will be transformed over the next 15 years to be like these quite different localities.

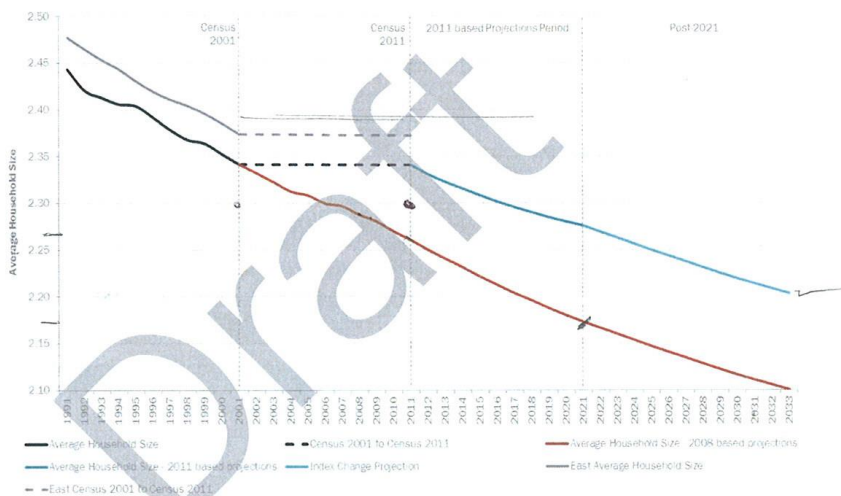
While various documents quote the 'official DCLG' projection of household size to justify the projection down to 2.1 people per household, the DCLG projection is based on a projection made in 2008 before the 2011 census. It therefore does not represent a credible piece of evidence because more contemporary evidence is now available.

Graph showing actual household size over last 50 years



Breckland Projections from 1991 only.

Figure 3.1 Trends in Household Formation (Average Household Size) in Breckland (1991-2033)



Commuting rates

Within Breckland's housing estimates, they appear to assume that the level of commuting out of the district to work would remain the same over the plan period. Some acknowledgement should be made that the cost of fuel and therefore the cost travel is set to increase faster than salaries during the plan period. As travel costs increase, commuting out of the district will become less attractive, the demand for housing in Breckland will decrease and the demand in Norwich will increase, unless the decline in jobs is reversed.

Unemployment

Breckland's assumption is based on unemployment rates moving from the current national rate of 6.93% to the pre-recession average of 3.85% . This may be optimistic depending over what period the average was taken. If the average was taken over the boom years then it may be over-optimistic. This unemployment rate may be the national average rather than the Breckland average.

Alternative projections.

There are a wide range of projections that could be used. More work needs to be done and greater analysis carried out before numbers are fixed.

Housing delivery.

As Breckland have never delivered the number of houses it is suggesting that it needs to be delivered each year, are the figures proposed actually deliverable? If the numbers are undeliverable, then there will never be a 5 year land supply and in effect no Local Plan!

Question 5.

What level of housing growth should Local Plan provide? Are there any reasonable alternatives that should be considered?

Town Council questions fundamentally the basis of the housing numbers if the household size of 2.39 is not used as a basis for calculating the housing numbers.

Of the options provided, Option 4 would be the preferred option, but it is felt that even this figure may be incorrect and undeliverable.

If the household size assumption is correct then the houses being built should be 1 and two bedrooms rather than 3 and 4 bedrooms.

Comments on

Paragraph 5.16 – the ‘Policy On’ Option

The ‘Policy On’ option should be linked to particular areas, i.e. if jobs are created in Thetford then more housing should be directed to Thetford, if jobs are developed in Dereham then Dereham could sustain more housing. It would be unsustainable for example to develop jobs in Thetford but deliver houses in Dereham. The ‘Policy-On’ option could be linked to job creation in particular areas, so that when the concentration of jobs, as a proportion of the working age population, has increased to a particular level in that area, then there would be an option to deliver more housing there.

5.18 influence of the greater Norwich

Large numbers of people from Dereham commute to Norwich to work. This could be considered an unsustainable pattern of work. Fuel prices are set to increase at a faster rate than pay, this will mean that people on low incomes will need to use an increasing proportion of their income on travel cost. If there are more jobs than people in Norwich then it would be more sustainable to build additional housing around Norwich rather than Dereham. There is, after all, as much land on the outskirts of Norwich as there is on the outskirts of Dereham.

The Town Council would not like to see Dereham develop as a commuting suburb of Norwich.

Affordable Housing

5.33 seems to suggest that the reason to provide affordable housing from a sustainability angle is so that people on low income can afford to live near to where they work. If this is the case, i.e. that affordable housing is for Breckland residents and those with jobs, then perhaps restrictions should be placed on the affordable properties that they are for people with a local connection and who work in the locality.

Question 6

What level of affordable housing provision do you think can achieve a better balance between affordable housing provision and other priorities?

Option 8: affordable housing should be kept at 40%.

Comment.

Affordable housing should be linked to people with a local connection or who work in the locality. There should be an option for self-build sites and affordable housing should be provided in the villages to cater for local needs.

General Economic Strategies

6.4. It is stated that “if there are not enough jobs for the local workforce, then the area may suffer from higher unemployment rates or unsustainable commuting beyond the district”

Since 2001 Breckland has seen a reduction in the amount of jobs as a proportion of the working age population; the level of jobs in Breckland is the lowest of any authority in Norfolk and Suffolk. This was not the case in 2001. Breckland has therefore become less sustainable, with regards to its economy, than other districts. For Breckland to get the level of jobs it had in 2001 there would need to be an increase of 4000 jobs with no increase in working age population. This statistic is backed up by the increase in the level of unemployment in Dereham over the last 10 years. In 2004 Dereham Central had an unemployment rate of 1.7%, well below the national average of 2.5%. It now has an unemployment rate of 4.2% compared with the national average of 2.4%. The trend is that unemployment in Dereham has been increasing at a faster rate than both the National and the Breckland average – this is clearly an unsustainable trend.

Labour Market indicators: Jobs as a proportion of working age population

	2001	2002	2003	2004	2005	2006	2007	2008	2014
ENGLAND	0.83	0.84	0.84	0.84	0.84	0.83	0.84	0.83	0.79
Norfolk	0.8	0.79	0.8	0.81	0.82	0.84	0.81	0.78	0.79
Breckland	0.7	0.68	0.67	0.71	0.74	0.7	0.67	0.67	0.65
Broadland	0.67	0.63	0.69	0.7	0.68	0.65	0.7	0.68	0.75
Great Yarmouth	0.75	0.72	0.78	0.73		0.79	0.76	0.74	0.74
King's Lynn and West Norfolk	0.76	0.75	0.75	0.79	0.79	0.75	0.78	0.78	0.77
North Norfolk	0.75	0.74	0.76	0.76	0.76	0.74	0.7	0.67	0.73
Norwich	1.3	1.25	1.19	1.17	1.22	1.32	1.21	1.09	1.06
South Norfolk	0.6	0.68	0.71	0.74	0.75	0.79	0.73	0.72	0.77
Suffolk									0.80
Babergh									0.72
Forest Heath									0.70
Ipswich									0.83
Mid Suffolk									0.73
St Edmundsbury									0.96
Suffolk Coastal									0.85
Waveney	0.75	0.75	0.66	0.71	0.71	0.77	0.71	0.69	0.70

This level of jobs has led to an increase in out commuting, by 12% between 2001 and 2011. By the statement made in 6.4 this is an unsustainable trend and in order to deliver a low carbon economy, the trend should be reversed through the local plan. Out-commuting is not only unsustainable but it also has a negative impact on the local economy. If there is net out-migration of just over 11,000 people per day, they will have less money to spend in the local economy because they will be

spending money on travel; they will also be more likely to spend it in the location where they work, particularly if they work in Norwich where there is a much wider choice of shops.

The reduction in jobs as a proportion of the working age population since 2001 is also clear evidence that while the local plan can allocate land, it has no control over whether the land will be developed nor the time scale of any development. So while housing growth can be almost guaranteed, jobs growth cannot and this should be addressed within the policies of the Council otherwise there is no control over sustainability. This is why the 'Policy On' option is difficult to justify as Breckland has not got a good track record of delivering jobs growth in the District.

Employment Growth Study.

As this is an important document that feeds into the Issues and Options document, it is not understood why local stakeholders consulted were not representative of the business community or the wider community. No Dereham District or Town Councillor was consulted; neither was the Town Council.

- The document states that Dereham is still “marred by the collapse in 2005 of the trailer maker Crane Fruehauf”. This paints a negative image of the Town and does not take account of the main Cranes site on Rashes Green being taken over and the development of the Cemex site. It states that the Cranes site at South Green has been constrained because of perceived 'Employment noise issues'. It is more likely that development on the South Green site is constrained because the building has been demolished and an outline planning application for residential development was submitted 2009.
- The report later goes on to state that sites on Rashes Green have not come forward and residential should be considered because of the sites' proximity to housing. These sites are boundary sites so, using the report's own logic, if they are used for housing it will bring new housing close to existing industrial areas and make those industrial units unattractive too.
- The report also talks about wanting to encourage growth in office space. If office space will be needed in the future, then this wouldn't conflict with residential properties. It is concerning that agents are deciding whether sites should be kept for industrial uses or whether residential uses should be sought. The site intended for the expansion of Rashes Green is where the agents state that it 'would have limited market appeal'. Before such a statement should be accepted, evidence should be considered relating to whether the site has been marketed or not and whether it would be suitable for office-type developments.
- The commuting flows are based on the 2001 census rather than 2011 census data.
- It paints a positive view of economic development by saying that the workforce has increased higher than the regional and national average but it makes no mention of the actual jobs growth. It shows the level of jobs growth higher than the national and regional average but doesn't consider the number of jobs as a proportion of the working population or the out-commuting and their impact on the long term sustainability of the District.

- With regards to balancing jobs and population, the Employment Growth Study did not make any reference to this or seem to consider net out-commuting as a sustainability issue. It also refers to Thetford Abbey as having entrenched deprivation. However, the statistics seem to show that Dereham Central has a higher rate of unemployment than Thetford Abbey and has a higher rate of those people out of work for more than 12 months: 37% in Dereham Central and 27% in Thetford Abbey.
- In 2004 Dereham Central had an unemployment rate of 1.7%, well below the national average of 2.5%. It now has an unemployment rate of 4.2% compared with the national average of 2.4%. The trend is that unemployment in Dereham has been increasing at a faster rate than both the National and the Breckland average. This is an important and significant trend which has not been analysed within the report.
- The conclusion that Dereham is constrained for office development because of its proximity to Norwich seems to conflict with the fact that many people from Dereham commute to Norwich. If Dereham is in commuter distance from Norwich, then a business locating to Dereham could draw on a labour pool which includes Norwich.

The Town Council feels that the Breckland Employment Growth Study should be refreshed and updated to ensure that it contains current and relevant information before it is used to develop the Local Plan policies. The study should consider and reflect the Sustainability issues set out in 6.4 of the Issues and Options document. When it is refreshed a wider stakeholder group should be used including representatives from town councils and the draft report circulated more widely for comments.

Question 14

Do you agree with the key policy issues identified within the Employment Growth Study?

The delivery rate of employment space should be increased to bring the concentration of jobs up, reduce out-commuting and therefore increase long term sustainability. This would be in line with NPPF 17: planning should “support the transition to a low carbon future”.

Because the proposed Local Plan options will not have any control over the speed at which commercial land is developed and jobs are created, Breckland Council should consider actively developing commercial land.

Consideration should be given to the recently announced promised improvements to the A47. This could lead to an increased demand for commercial land along the A47.

Question 15

Which scenario do you think could best reflect the future employment needs of the district?

It is difficult to say what the future employment need is. Referring back to the suggested sustainability measures and the statement made in 6.4, the level of future employment is that which will balance jobs with working age population and reduce the trend of out-commuting. The projected numbers are unreliable because small numbers of developments are being considered.

The number of jobs will depend on the specifics of each development. For example a large piece of land currently being developed next to Elizabeth House will deliver just 1 job. There needs to be a policy link between housing growth and jobs growth.

Question 16

Do you agree with the view of employment space supply and demand as discussed? Do you consider any area could benefit from a particular form of employment development.

The Town Council does not agree with the idea of rationalising employment land on Rashes Green. There is no mechanism to ensure jobs growth keeps pace with housing and population growth. To ensure that as housing is delivered and population grows, the jobs supply increases at the same rate, consideration should be given to having a more flexible approach to development so that housing development delivers commercial units and, where appropriate, commercial developments deliver housing. So for example where a housing development delivers 100 residential units, it must also deliver employment space equivalent to 150 jobs through a mixed use development. If offices are built, it should not conflict with the residential properties, if properly designed. If developments are so small so as not to be able to deliver on-site jobs growth, then the possibility of whether section 106 funding could be collected from developers should be investigated. This approach is in line with NPPF para 21: “in drawing up Local Plans local planning authorities should: facilitate flexible working practices such as the integration of residential and commercial uses within the same unit”.

Given the recent announcement regarding the improvements to the A47, consideration should be given to allocating a large strategic site for large scale commercial use.

Question 17

Economic growth should not just be concentrated around Thetford and the A11 corridor. This is contrary to the statement under 6.4 which stresses that housing and jobs growth should be balanced. It therefore follows that economic growth should be directed, in a balanced way, towards where housing development is, setting a long term target to increase the level of jobs as a proportion of the working age population, reduce out-commuting and increase the level of employment in the towns so that they are in line with the national average.

Town Centre retail strategy

General comments.

Policies to support the viability of the town centres and Market Place should be considered. Policies should, however reflect the changing nature of the high street and be flexible to meet local demand. Town centres should not just be restricted to retail: if office and estate agents are in demand, then the policy should be flexible to accommodate these rather than restrict primary frontage to retail.

Question 24

Of the two options, option 28 is the preferred option but the Council still has reservations, as it does not reflect the Council's aspirations.

Transport Strategies

Paragraph 6.61

The Town Council agrees with these statements with the addition that bus services may not be more sustainable than cars: it would depend on the average number of passengers for the whole service. Bus services may not be financially sustainable for people on low incomes; it also takes money out of the economy. The assumption is often made that bus travel is a sustainable form of transport. This is not always the case and reliance on long distance commuting, even by bus, does not accord with NPPF 17, "to support the transition to a low carbon future".

While these statements are good, there do not seem to be any policies proposed which would actually deliver them. More in-depth analysis of the cost of commuting, either by bus or by car, needs to be carried out. Simply assuming that bus travel is sustainable is simplistic and does not take account of the financial cost to people on low incomes.

Paragraph 6.62

There appear to be some bullet points missing! Thetford, Attleborough and rural areas all get a mention; is there to be no investment in infrastructure for Dereham, Watton and Swaffham?

Question 25

Are the transport investment priorities listed above appropriate to facilitate sustainable development? Is there anything else we should consider?

Congestion in Dereham is a key issue which has not been considered. Many junctions in Dereham are at saturation point and no longer deliver the expeditious movement of traffic. Studies need to be carried out to understand the capacity of the highway network before new land is allocated. Clear measures need to be established as to the level of congestion which would be considered unacceptable before an assessment is made. Land should be allocated in accordance with NPPF 30: "encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion".

There is no coherent walking and cycling strategy for Dereham; initiatives are developed ad-hoc in reaction to new developments rather than having a strategic vision for the town.

It has been long recognised that a bus interchange needs to be developed in Dereham town centre

Protection of Non-statutory sites

7.15 The concern about development in the rural landscape could also apply to the edge of towns, which are also often rural in character. Development can threaten the function of the edge-of-town landscape. The landscape around towns is no less or no more valuable than the landscape near most villages.

Question 27

Protection for non-designated sites.

Green infrastructure should be considered in and around towns. Green infrastructure studies should be updated to show how developments can enhance the connectivity of wildlife through designated green corridors. This is in accordance with NPPF 9 “to move from a net loss of biodiversity to achieving net gains for nature”.

Areas such as Dumpling Green may not be designated as a wildlife site but because of the level of old hedgerows, Dumpling Green provides a good site for wildlife and biodiversity.

Open Spaces

Question 28

There is a need for additional informal open space in and around Toftwood along with more sports pitches for sports clubs.

In considering open space, consideration should be given to footpath networks and when developments are considered, linkages should be created to ensure new developments have easy access to the footpath network and the wider countryside.

The value of small amenity areas in residential areas of towns should be given adequate protection through the local plan. These provide important amenity features in residential areas.

Question 29

Some amenity areas have already been identified and been submitted. There should be an open file on designation: the local community should be able to continue to nominate areas at any time.

Spatial Strategy

Option 31 seems to be concerned about the quality of the rural environment, however there doesn't seem to be any concern for the quality of life for people who live in the towns. Consideration should be given to this.

Question 30

Are there any other reasonable alternatives?

There are no options that fulfil Dereham Town Council's aspirations but Option 32 was the “least worst” option.

Sharing development evenly around all settlements would be an alternative. For example, excluding Thetford and Attleborough, if there were a need of, say, a 10% increase in houses, then

each settlement could increase by 10%. This would mean a settlement currently of 100 properties would get an additional 10 houses and a settlement of 10,000 houses would get 1000 houses.

8.2.2 Dereham

8.99. Statements like 'Dereham will experience significant employment growth' should really read 'it is hoped that Dereham will experience significant employment growth'! There are currently no policies which could ensure jobs growth, other than passively allocating land. Even then, this statement seems to conflict with 6.16, which states that economic growth will be directed towards the A11 corridor.

Site Allocation

In the SHLAA.

D08, D16, D05, D23. No detailed explanation has been given regarding why there cannot be any improvements to the Swanton Road / Kings Road Junction. Development in this area could be a way to get improvements to this junction. This would be a preferred location for development as it is within easy walking distance of the Town Centre.

D16, D05, D23. NCC own a strip of land alongside the level crossing, the road could therefore be widened.

D12 Can it be explained why the nursery site was not given a soil classification? Soil classification broadly identifies the most productive land. It is understood that, from a planning perspective, the most highly productive land should be protected from development. Part of this site being a nursery, it will be the most productive land in Dereham, possibly equivalent to grade 1. Also, this site currently employs a number of people. The fact that it provides any employment at all should be considered a major constraint.

Housing delivery.

Question 40

Do you have a preferred location/direction for growth in Dereham?

Dereham has a lot of development in the south of the Town. Sites on the north-eastern side of Dereham would be more sustainable because they are within easy walking distance of the town centre with a wide choice of bus services.

There should also be policies to allow genuine self-build projects.

Question 41

Do you consider the existing employment areas remain Appropriate?

There is currently no opportunity to offer a large strategic site, which could now be more attractive in view of the upgrading of the A47.

Question 42

Yes

Question 43

About right but there may need to be some minor changes. It was difficult to assess with such a small plan.

Natural Environment**Question 45**

There is very little difference in the sensitivity to the landscape around Dereham: it is all highly sensitive.

Implementation and Viability

9.2 There doesn't seem to be any recognition that there may be infrastructural needs in Dereham.

Key delivery issues for Dereham are:

- Capacity of the primary schools, and sixth form
- Doctors surgeries
- Capacity of the Road network – excessive congestion at peak times.
- Jobs growth falling behind growth in working age population.
- Lack of formal sports pitches.

Question 68

The road infrastructure and its capacity to absorb additional traffic needs to be properly assessed to understand the likely cumulative impacts developments will have on specific junctions and the overall network.

Bus interchange needs to be developed to give a proper communications hub in the centre of town. Depending on the location of development, consideration should be given to ensure a circular bus route can be established around the town.

Infrastructure should be considered to enable the development of commercial land and creation of jobs.

The meeting closed at 10.00pm.

Chairman