

Dear Andrew,

Please find the Town Council's comments on the current round of consultation. If you would like to discuss anything with me or if anything is unclear please give me a call.

The District Councillors for Dereham have been copied in so that they are aware of the comments from the Town Council.


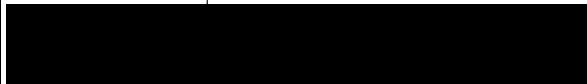
The Council has asked me to point out that it is particularly concerned with MM33 and the re-drawing of the settlement boundary. Over many years the Town Council has successfully established a clear buffer to protect the amenity of shillings lane – the proposed modification could undo all that work.

Please confirm that these comments have been received and will be submitted to the inspector.

Thank you

Dereham Town Council  
11 July 2019

**Part A – Contact details**

1. Your name and address	
	
Organisation/ Company:	Dereham Town Council
Address Line 1:	Assembly Rooms
Address Line 2:	Quebec Street
Postcode:	NR19 2TX
Telephone number:	01362 693821
	

2. Agents name and address	
Title:	
First name:	
Surname:	
Organisation/ Company:	
Address Line 1:	
Address Line 2:	
Postcode:	
Telephone number:	
Email address:	

**Part B – Your representations**

Please use a separate form for each representation.

**B1. To which proposed Main Modification does your representation relate?**

<b>Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM1)</b>	<b>All Dereham Allocations – MM – 34,35,36,37,38,39,40,41,42,43</b>
<b>Description of main modification (e.g. page 1, paragraph 1, Policy 1)</b>	<b>Dereham Transport Study is now unsound.</b>

**B2. Do you consider this proposed modification is:**

Legally compliant? <i>Please provide an X beside one answer</i>	Yes: X	No:
Sound? <i>Please provide an X beside one answer</i>	Yes:	No: It is unsound.

**B3. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?**

Positively prepared? <i>Please provide an X beside one answer</i>	<b>Positively Prepared:</b> The plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.	Yes:	No
Justified? <i>Please provide an X beside one answer</i>	<b>Justified:</b> it should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence.	Yes: X	No:
Effective? <i>Please provide an X beside one answer</i>	<b>Effective:</b> it should be deliverable and based on effective joint working with partners and neighbours.	Yes: The infrastructure required is no longer deemed deliverable.	No:
Consistent with national policy?	<b>Consistent with national policy:</b> it should enable the delivery of sustainable development set out in national policy.	Yes: The infrastructure required is no longer deemed deliverable.	No:

**B4. Please give details as to why you consider the Local Plan with proposed modifications is not legally compliant or sound?**

**B5. Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

*You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

**Dereham Transport Study**

All the following comments refer to all the Dereham Allocations 1,2,3 and 4

Comments on all these policies are the same and relate to the Dereham Transport Study.

Dereham Town Council commented on Dereham Transport Study in its written statement (Matter 14) and the Dereham Transport Study was discussed specifically at the Local Plan Examination.

The Following summarises why the Local Plan should be considered unsound:

In the infrastructure Delivery Plan 2017 Breckland Council State that [for Dereham]:

*“due to existing issues regarding congestion, it is important that any future growth is planned with the necessary mitigation measures and improvements to the transport network to ensure existing issues are not exacerbated by new developments”*

The Dereham Transport Study (as evidence for the Local Plan) identified two improvements that were needed at Tavern Lane (by 2026) to mitigate the effects of the proposed Local Plan Development. Option 1 was minor changes to the existing junction (now completed with NPIF money). Option 2 was the introduction of a signalised roundabout at Tavern Lane.

In the report to the Local Plan Working Group (referring to both options 1 & 2) it is stated that

*“improvements to the capacity of the Tavern Lane/Yaxham Road junction are feasible”*

The report also stated that interim costings for the scheme had been derived using DfT guidance and approved by NCC.

i.e.for the Local Plan some significant infrastructure has been agreed as being needed and confirmed as being feasible.

In its submission to Matter 14 of the Local Plan Hearing, the Town Council pointed out that Option 2, the signalised roundabout, required considerable levels of funding which neither Breckland or NCC had budgeted for. Option 2 also included land purchase which had not been budgeted for.

At the Local Plan Hearing Session these issues were discussed at length, the NCC officer never stated that NCC had concerns regarding the deliverability Option 2.

In March 2019 Norfolk Council published a report titled “Dereham Network Improvement Strategy” within this report NCC state that:

*“this scheme [Tavern Lane Roundabout] would involve significant third party land and so is not considered deliverable by the highway authority”*

So with regards to the Local Plan’s soundness test, for Dereham, the Local Plan is unsound because a major piece of road infrastructure was identified within the evidence base as being needed in order to mitigate the impact of growth on the highway network, but Norfolk County Council have subsequently announced that signalised roundabout at Tavern Lane (Option 2 in the Dereham Transport Study) is not deliverable.

Dereham will see the Local Plan Growth but will not receive the highways mitigation identified as being needed to accommodate that growth, the Local Plan is therefore unsound.

At the Local Plan Hearing Session when the Dereham Transport Study was discussed, Breckland Council’s consultant stated that the Dereham Transport Study was robust because the revised traffic growth figures had been lowered from 30% in the main study (using TEMPro v6.2) to 9% in the additional Saturday analysis (TEMPro v7.0).

At the Hearing the Town Council challenged this and said that TEMPro v7.2 showed that projected traffic growth was back up to around 30% again. The Breckland’s consultant stated that he had checked this and the 9% was robust. This is factually incorrect a detailed explanation of this is laid out below.

**Detailed explanation regarding the changes to the predicted traffic growth.**

There were two parts to the WYG Dereham Transport study - the first part included the signalised roundabout and stated that such a feature would be needed in the long term. This first part used software and data called TEMPro 6.2 to predict traffic growth. Using TEMPro 6.2, traffic in Dereham was predicted to grow by of around 30% to 2036.

Saturday was not included in the WYG Study so a further report was commissioned to take Saturday into consideration. In this new report, WYG reported on the changes to the traffic growth predictions in the next version of TEMPro; version 7.0. In TEMPro 7.0 it was predicted that traffic growth would be 9.5% to 2036. The difference between TEMPro version 6.2 and TEMPro version 7.0 is so significant that it should have been explained at the time, but was not.

If we now look at TEMPro version 7.2 (the most recent version), the predicted traffic growth in Dereham is back up to around 30% to 2037 (34% on Saturdays). TEMPro version 7.2 was released by February 2017 - well before the local plan hearing.

The explanation of the sudden and temporary drop in predicted traffic growth in Dereham using the TEMPro 7.0 is that data for the version 7.0 came from the Breckland Council’s 2014 Annual Monitoring Report (AMR). This AMR did not include future development scenarios, therefore the TEMPro version 7.0 **excluded** background growth associated with future development scenarios. This explains why the version 6.2 predicted 30% increase, version 7.0 predicted 9.5% and version 7.2 predicts 30% traffic increase.

### Part C – Notification request

You can request to be notified at an address or email address of any future stages relating to the Local Plan.

#### C1. Would you like to be notified of future stages of the Local Plan?

Yes: X	No:
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#### C3: How would you like to be notified?

By post to my address:	
By post to my agents address:	
By email to my email address:	
By email to my agents email address?	

*Please mark one answer*

### Part D – Data protection

Representations cannot be treated in confidence. The Town and Country Planning (Local Planning) (England) Regulations 2012, requires copies of all representations to be made publically available, this will be done via the Council's website. The Council will not publish personal information such as addresses, telephone numbers, or email addresses. By submitting a representation you confirm that you agree to this and accept responsibility for your representations.

<b>Signature:</b> [REDACTED]	<b>Date:</b> 11/7/2019
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