

Comment on the Borough Council's Local Plan Review Sustainability Assessment

General comments

- 1 The publication of a Sustainability Assessment (SA) is welcome. My observations below relate to the highways and transportation aspects of sustainability only and should be read in this context. The extent of the detail is overwhelming to the ordinary reader, but I have read the Assessment in its entirety in conjunction with relevant sections of the National Planning Policy Framework (latest edition, March 2021) (NPPF) and National Design Guide (NDG). My observations are therefore based on cross reading of these documents and Norfolk County Council's Local Transport Plan 4 (LTP4).
- 2 The methodology used to assess the sustainability of the draft Local Plan Review appears thorough. The addition of Climate Change criteria (objective 11) and the strengthening of the highways and transport criteria (objective 8) as a result, are essential additions and the changed position of the Borough Council on such important policy issues is welcome.
- 3 The definition of sustainability in the NPPF is set out at para 7. It is the same as in previous editions, so it is well-established. It is "meeting the needs of the present without compromising the ability of future generations to meet their own needs." This is further demonstrated by the UK being a signatory to the UN's "17 Global Goals for Sustainable Development by 2030". Within the NPPF the definition of sustainable transport is "Any efficient, safe and accessible means of transport, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport" (Annexe 2, Glossary). This definition is also found in the NDG. These are extremely important parameters which the Borough really has to stop ignoring in its planning policy and decisions.
- 4 The King's Lynn Civic Society responded to the consultation of the Local Plan Review on 29th April 2019. It highlighted constant failure by the Borough's planners to properly assess and set policies for sustainability, especially sustainable transport. They stated then "we feel all new planning documents must place sustainability at the centre of all policies" and "We feel the current Local Plan fails to define what sustainability really means for West Norfolk, or what planning policy needs to achieve in order for our community to be 'sustainable'. It is clear from this SA that their input has not been heeded and the SA shows there is little intention to meet the UN Goals, nor the government's NPPF or NDG goals. It shows an arrogance amongst the Borough's planners that international and national direction does not apply in West Norfolk. It does.
- 5 The proper way to assess the Local Plan Review policies and individual site allocations must be against the criteria in these documents, as they set out government objectives and policies on what the planning system should achieve. The SA fails the test.

More specifically

- 6 There appears to be little objectivity in the scoring of policies and sites against these criteria. In many, if not most examples of both, the highways and transport scores were given as positive or 'depending on implementation' when in fact, objectively, the impact was at very best neutral or more usually negative. Thus the overall scoring of both the policies and individual sites has been skewed, maybe deliberately, to show a positive overall result (+478 for policies and +226 for site locations overall).

- 7 In most of the site allocations, highways and transport sustainability scores are set by reference to Norfolk County Council's (NCC) view (as the highway authority) as to whether they would support development. This is often listed as "subject to suitable access" or "subject to an adequate visibility splay" (at the site entrance). These are appropriate planning criteria but they are not, and can never constitute, sustainability criteria. It is this inappropriate inclusion of NCC's view on development opportunity which totally skews the SA outcomes. Indeed, if a proper assessment had been used and scored objectively, the sustainability index for sites would drop from +226 to a negative, and for its policies from +478 to a very slight positive. This is therefore no basis on which the Local Plan Review and site allocations should be judged, nor to set the Borough's lacklustre sustainability goals for the next decade.
- 8 Site Suitability Factors include access to services which includes the "availability of public transport to town centres or similar major centres". Both the policy and in most locations this scores either positive or highly positive whereas in fact there is no public transport provision, and street design, road widths or raised platforms effectively eliminate the possibility of public transport being provided to the site. This is contrary to guidance in NDG (paras 75, 78, 79 and 81) and requirements in NPPF (paras 104, 105, 110 and 112).
- 9 The SA includes whether or not the policy or site allocation meets the above criteria. Within that, the only objective way to assess public transport sustainability is whether or not the Borough has complied with its own 2011 Local Plan policies and NCC's LTP4 by securing appropriately sustainable levels of developer funding for such transport services. Where this is not the case, an objective sustainability score should be at best neutral for very small development sites, or negative or very negative for larger ones.

Some examples of planned transport sustainability failure

- 10 In some instances, because the appraisal is based on the 2011 Local Plan and 2016 SADMP, the SA includes sites that have already been developed. Examples include site F2.4 at Chalk River Road off Redgate Hill, Hunstanton. That they are included offers a good, factual, insight into how appropriate the appraisal actually is. The highways and transport criteria is scored "depending on implementation" which, factually, is that the site has deliberately been designed so that public transport cannot access it, and the road layout at the closest point to an existing bus route narrowed so that there is no opportunity for buses to make a stop there. Thus sustainable transport options have been deliberately designed out, contrary to all NPPF and NDG policies. The score should therefore be 'very negative' rather than 'depending on implementation'.
- 11 The West Winch Growth Area, site E2.1, receives scant analysis for what is the largest development in the Borough in the plan period. One senses that the writer of the Assessment is out of their depth as it states only that the relief road will "provide access and permeability to parts of the Growth Area, some of the submitted sites, due to their location, are detached from this 'fixed line' and/or Growth Area itself. This connectivity is vital to achieving links and integration between the new residents and businesses and can contribute to a healthy community." There is no evidence for this, nor for why highways and transport scores positive when there have to be very serious doubts whether NCC – and especially the developers who have submitted Transport Assessments thus far – have

any intention of ensuring attractive public transport accesses the development sites, thus risking making this largest growth area permanently car-dependent, contrary to requirements in the NPPF and NDG.

- 12 In Downham Market, residential sites F1.3 and F1.4 are marked as highways and transport positive, and the narrative states “offers good opportunity for public transport via Bus services and Train station”. Yet without developer funding bus services will not be provided, and as none has been sought by the Borough Council contrary to its 2011 Local Plan and NCC’s LTP4, let alone secured, and as NCC foresees no public transport services either, it is emphatically clear that these are to be developed as car-dependent sites, contrary to requirements in the NPPF and NDG.
- 13 Site E3.1 off Edward Benefer Way in South Wootton has approval to be developed to a total of 575 houses. This is scored positive for access to services and very positive for highways and transport. This is an entirely subjective assessment and can only be based primarily on car being the means of movement in and out of the site. The narrative states “There is also the opportunity for future residents to use public transport in the form of buses or Train station” but that has not been provided for in the outline plan, and again there is no developer funding provided for a bus facility. That there is good quality cycle path connectivity is acknowledged, but this is not adequate either in bad weather or for those unable by reason of mobility impairment (contrary to the NPPF requirement para 112b), and that is why a good public transport system alternative is so essential to reducing car dependency. This is absent from the assessment, not only here, but throughout all Borough planning, contrary to requirements in the NPPF and NDG.
- 14 Some sites that have been approved but yet to have Reserved Matters assent, such as Knights Hill at South Wootton, have, perhaps conveniently, not been included in the assessment. If it were, it would likely score positive for access to services and very positive for highways and transport. Yet in truth that is far from accurate even despite securing funding for public transport services. This is because the road alignments within the site, according to the Reserved Matters application, limits buses to a maximum length of 7.5m which is effectively too small to bulk move children to school or to provide enough seats for future viability. Not only that, but after the developer agreed £800k funding for bus service provision for the site, NCC declined it stating that, in effect, attractive public transport was not required for the 600 homes to be built. Thus, cleverly, the public authorities have enabled a developer to design in long-term car-dependency, contrary to their own policies which say all the right things to align with the NPPF and NDG requirements but which are ignored by them in practice.

Conclusion

- 15 In all respect, therefore, the fact that there is a Sustainability Assessment is welcome. The objectives and criteria on which it is scored are supportable. What is not, though, is the Borough’s misuse of NCC’s views on whether a development would be supported on highways criteria as being sustainability criteria when they are very clearly not so. Further, analysis of one development included but which has already been built out, and others at various stages in the planning pipeline, show clearly that the scoring against criteria is both subjective and not borne out in practice. It is for these reasons that the Assessment should be withdrawn or voted down, and, using the same objectives and criteria, re-worked based on proper objective, measurable, considerations.