

**Written Representation of Peter Goodyear
on behalf of Fordham (Cambs) Walking Group**

Sunnica Energy Farm
Planning Inspectorate Reference EN010106



November 2022

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1 BACKGROUND

1.1 My name is Peter Goodyear and I am a retired town planner resident in Fordham, where I run the Fordham (Cambs) Walking group of 172 members. This written statement is submitted on behalf of the group. I am also a member of other walking and cycling groups and am involved in campaigns and consultations to promote active travel and to improve local routes.

1.2 The Fordham Cambs Walking Group (FCWG) includes members from neighbouring villages. Members have expressed strong concerns regarding the inadequacy of mitigation relating to permissive routes. Other significant concerns have been expressed regarding temporary loss of routes during construction, fire safety, countryside character, ecology, and loss of productive farmland. Also, people are feeling threatened with a strongly perceived isolation of village communities as a result of the sheer amount of panels and associated structures proposed over a such wide area. It is also fair to say that most members are supportive of the principle of carbon reductions through renewable energy projects. The issues are around the how much, what and where, together with community impacts and lack of mitigation.

1.3 FCWG members have group activities and share individual routes in the area. There is consensus that walking and cycling routes in our area are currently inadequate. There are villages which are isolated for walkers insofar as the next village is only accessible along roads without footpaths. Where a PROW exists, it is often a far from direct route. In other cases, there is no attractive safe circular route available, which discourages wellbeing walking.

1.4 Having looked at the written submissions from parties with registered interests, it appears that the concerns identified at 1.2 are largely represented, except for the apparent representations concerning the inadequacy of mitigation relating to permissive routes. Expert opinion is available under several headings including fire, highways, agricultural productivity, ecology, and landscape impact. Representations from the local authorities and Ramblers' Association in relation to PROWs focus on adverse effects during the construction phase and the FCWG supports these concerns.

1.5 In the light of 1.4, in the interests of expediency and to avoid duplication; this statement will confine itself principally with the inadequacy of mitigation

relating to permissive routes which do not appear to be covered significantly elsewhere.

1.6 The inquiry process encourages written representations and I have accepted that. Although not registered to speak at the hearings, I am available if the Inspectorate team thought it appropriate.

2 SUMMARY OF OBJECTION

2.1 This written statement highlights the applicant's failure to adequately assess the existing network of walking and cycling routes in the locality. As such, the applicant fails to identify the gaps in the current network of walking and cycling routes. As a result of these failings, the proposal fails to make adequate provision for proposed measures to improve access by walking and cycling.

2.2 The failings identified in this statement are such that it is considered that there is a failure of the applicant to respond adequately to the policies and advice referred to.

2.3 The applicant is urged to amend the proposals within the DCO by incorporating additional permissive routes. In the event of a failure to respond, the Inspector and in turn the Secretary of State are urged to consider if consent might be withheld, or what additional appropriate mitigation requirements might be attached if minded to grant development consent.

2.4 The local communities are feeling threatened and a potential sense of isolation because of the amount of development proposed over a wide area. Further mitigation measures are requested to mitigate the adverse socio-economic impacts of the development. Particularly, to improve walking and cycling facilities for visitors and the local community alike.

3 OBJECTION STATEMENT – Rebuttal of Applicant's Assessment

3.1 The submitted details seriously lack rigorous attention to policy requirements. As a result of this, the proposed scheme design is insensitive to, and fails to respond to, wider community needs for better walking and cycling routes.

3.2 The Applicant's Planning Statement – Transport and Access, Page 92, Paragraph 6.9.1 states: *"There are limited footways and pedestrian and cycle facilities in the area however there are several PRow crossings of the Sites and Grid Connection Route A and Grid Connection Route B, which are illustrated in Figure 13-2 of the Environmental Statement [EN010106/APP/6.3]. Three PRowS (W-257/002/0, W-257/002/X, and W257/007/0) are located within the boundary of the Sunnica East Site A"*

The applicant acknowledges that there are limited footways and pedestrian and cycle facilities in the area. Sequentially, the applicant then fails in the Planning Statement, Design and Access Statement (2.2.39) and EA, to fully address and respond to national and local policies which seek to remedy such shortfalls. Please see appendix FCWG-1 for the relevant policy extracts.

3.2 It is fair to say the applicant does suggest some routes, but these are extremely limited and not informed by any thoroughgoing analysis to find critical gaps in the local network. The applicant's Planning Statement 6.9.15 states: *"The Scheme also proposes to create three new permissive routes across the Sites. These are discussed at section 4.7 of this Planning Statement and illustrated on Figures 3-1 and 3-2. These permissive routes will enable increased public access across the landscape of the local area and thus respond positively to local Green Infrastructure Strategies and local planning policies relating to rights of way"*.

3.3 There are potentially better routes benefiting more people, over a wider area, that have been overlooked. Please see Figure FCWG1 (paragraph 5.2) for a plan of additional suggested routes overlain on the applicant's existing public rights of way map. Three of the four links the applicant proposes are very short, and in total are not impressive in relation to the very large footprint of the DCO boundary.

3.4 The applicant's Planning Statement considers human health issues at 6.11.3 *"The NPPF (paragraphs 81, 84, 92, 93 and 100) and local planning policies support sustainable economic growth; the achievement of healthy, inclusive and safe places; and the protection of existing land uses and community infrastructure including rights of way"*.

Whilst that acknowledges the need to protect PROWs, the applicant's following commentary on that part, omits reference to parts of the relevant policies that require consideration to the improvement, and extension of, walking and cycling routes.

3.5 The Environmental Assessment Chapter 13 (para13.8.64) contains a statement: *“Walking and Cycling - The Scheme is located in a rural area with limited footways and pedestrian and cycle facilities in the area. This is due to the rural nature of the surrounding local roads; however, these are assumed to be lightly trafficked”*.

A similar statement appears in the applicant’s D&A PRow section 2.2.39. This approach, whilst acknowledging the shortfall in facilities, does not seem evidence-based with reference to the actual use by significant numbers of walkers and cyclists. Nor does it consider latent demand where the very absence of facilities and narrow carriageways discourage use. Many parts of the local roads are bleak, often with no trees, hedgerows or other ‘events’ to make them attractive to walkers. This leads to a preference for off road routes.

3.6 There are apparent contradictions and lack of evidence to support other statements in the EA:

13.8.64 *“These PRow are predominantly used for recreational purposes and there is a wide network of PRow in the surrounding area providing residents with alternative routes”*.

13.8.65 *“The Sunnica East Sites A and B are located in a rural area with limited footways and pedestrian and cycle facilities in the area. There are several PRow crossing and connecting the Scheme to local villages such as Worlington, Freckenham and Red Lodge. There are no on or off-road cycling facilities within the vicinity of the Sunnica East Sites A and B; however, the roads surrounding the Sites are generally lightly trafficked and therefore could facilitate cycling”*.

13.8.130 *“The PRow are assumed to be used predominantly for recreational purposes and there is a wide network of PRow in the surrounding area providing residents with alternative routes”*.

13.8.131 *“The Sunnica West Sites A and B are located in a rural area with limited footways and pedestrian and cycle on-road facilities in the area. There are no on or off-road cycling facilities within the vicinity of the Sites; however, the roads surrounding each of the Sites are generally lightly trafficked and therefore could encourage cycling. There is no data available on the number of pedestrians and cyclists using the PRow that will be temporarily closed; however, it is considered that the number of users affected will be low. The magnitude of change on those using the PRow is minor adverse, the sensitivity is low, therefore the significance of the effect during the construction period is minor adverse. This effect would be short-term and not significant”*.

3.7 I would contend that there is not a wide network of safe and attractive walking and cycling routes. It is wrong to assume that they are '*predominantly*' used for recreation where active travel to work, shopping and other journeys feature. We have members of the FCWG who are not car owners, and others who choose walking and cycling as their sustainable mode of choice for local journeys. The PROWs are largely fragmented considering journeys between neighbouring villages. The local roads in the lower hierarchy are of narrow width. They are used by large vehicles, a quarry, several transport yards, and farm traffic. The lower order road network provides frequently used local shortcuts for cars and HCVs. Whilst the roads are widely used by pedestrians, horse riders and cyclists, the conditions found are not comfortable and a deterrent to some people who might otherwise use them.

3.8 Schedule 8 of the DCO Works, land over which the applicant seeks rights rather than ownership does not provide for public permissive access routes. This is felt to be a fundamental flaw in the draft DCO.

3.9 Sunnica's ES Appendix 13A Relevant Legislation and Policy for Transport and Access at table 2-2 quotes Draft NPS EN-1 "*Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling ...*"

The FCWG considers that the applicant has not made an adequate assessment, nor considered fully, arrangements to be incorporated for improved access by walking and cycling.

3.10 The applicant's Design and Access Statement (EN010106/APP/7.3) includes a section 1.2 on "Flexibility of the design". There is however no indication of flexibility being offered in relation to the incorporation walking and cycling routes within the DCO boundary.

3.11 Sunnica's Application Document Ref: EN010106/APP/7.2 Planning Statement, Appendix B: Planning Policy Accordance Table 11 Relevant policy requirements for the transport and access assessment states the following: NPS-EN1 paragraph 5.13.4 Applicant's policy response table in Planning Statement to page 321. *Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for*

parking associated with the proposal and to mitigate transport impacts. The Sunnica response in the compliance column at page 321 of the Planning Statement is as follows: "Appendix 13C: Framework Construction Traffic Management Plan and Travel Plan of the ES [EN010106/APP/6.2] incorporates a framework travel plan, which includes traffic management and travel plan management measures. The Scheme also proposes enhancement measures which include three permissive routes which are identified in Appendix 13B: Transport Assessment of this Environmental Statement [EN010106/APP/6.2] which will result in minor benefits to NMUs in the long term. It is therefore considered that the Scheme is compliant with this policy".

3.12 FCWG were under the impression that there were four not three 'potential' permissive routes proposed by Sunnica: One parallel with Beck Road Isleham; one west of Green Lane Worlington; one west of Golf Links Road Worlington and one south of Elms Road. These are shown on the applicant's Figure 11: Post Construction PROWs, including the Permissive Paths at paragraph 4.6.2 of the Environmental Statement, Appendix 13B: Transport Assessment.

3.13 The FCWG do not agree that the scheme is compliant with the policies requiring attention to improved access for walking and cycling. Whilst some routes are incorporated, there is no evidence that these have been generated by any comprehensive assessment of walking routes in the area and the greater opportunities that exist for more meaningful improvements.

3.14 It is conceded that the 'potential' 0.7 mile route along Beck Road has some value as it links to bridleway W-257/002/X towards Worlington. However, the amenity is limited by it being alongside the road and an alternative route preferred route is suggested linking to East Fen Drove Isleham.

3.15 The potential 0.3 mile route west of Green Lane Worlington doesn't appear to go anywhere other than giving access to the native grassland planting area ECO3.

3.16 The applicant's potential 0.6 mile link west of Golf Links Road Worlington offers amenity value as part of a short circular walk, or cutting the corner for pedestrians and cyclists travelling between Green Lane and Golf Links Road.

3.17 The applicant's potential 0.4 mile route south-west of Elms Road to Badlingham Manor would have limited value. It would run parallel to and duplicate the route along Badlingham Road just 250 metres away. Badlingham Road at this point is single track with hedgerows and verges. It is very low traffic and one of just a few routes attractive to walkers and cyclists.

3.18 Taken together, the applicant's 'potential' permissive routes total 2.0 miles. To put this in context, this is on a DCO site that overall stretches 12.0 miles through the site from west to east; and 6.8 miles through the site north to south. The applicant's mitigation is considered woefully inadequate in this context.

3.19 The FCWG suggested additional mitigation routes would solve missing linear north-south and east-west gaps in the walking and cycling network. They would also afford greater opportunity for local circular walks from 15 local settlements.

3.20 The FCWG suggested route from East Fen Road Isleham to Beck Road would be 1.2 miles. The FCWG suggested route linking Broads Road Burwell to Heath Farm Road Red Lodge would be 7.9 miles long. At the Red Lodge end, the current Sunnica proposal is for the cable to pass underground below the River Kennet at approximately grid point 52°18.342'N, 0°28.253'E. It is suggested that a footbridge is provided at this point to solve a significant local access problem which I will explain.

3.21 In 1992, the new A11 Red Lodge bypass was built and bridleway W-585/005/0 and footpath 49/7 were diverted to run underneath it at 52°18.139'N, 0°28.601'E. The problem is that these two routes, although only 4 metres apart, are on opposite sides of the river, with no means of crossing. This problem is illustrated in the following two photographs:



3.22 The detour to reach the other side of the River Kennet just 4 metres away from this point is 0.9 mile. It wasn't a problem to cross the river prior to 1992 because the river was dry or certainly crossable on foot. This portion of the River Kennet now takes run-off from a large section of the A11 making it impassable on foot. A footbridge crossing within the DCO site would overcome this deficiency.

3.23 The building of the new A11 in 1992 could have been described as a major infrastructure project. With hindsight, it overlooked thoroughgoing consideration and response to local walking routes. I would urge Sunnica, the Inspectors and the Secretary of State not to overlook the opportunity to put things right. There are significant opportunities across the whole DCO, not just the River Kennet crossing. It is 30 years since the last opportunity in the area, when the new A11 and A14 were constructed.

4 OBJECTION STATEMENT against the DCO with Reasons

4.1 The applicant's assessments accompanying the DCO fail to adequately assess the network of walking and cycling routes in the locality.

REASONS: The applicant fails to provide adequate maps or survey evidence to properly consider this aspect. There has been no generation of desire lines for linear or circular walks and no assessment of environmental quality, safety and amenity along existing routes. No assessment of carriageway widths and whether footways are present.

4.2 Government Planning Practice Guidance on 'Travel plans, transport assessments and statements in decision-taking' states that a TA or TS should contain an *"Assessment of public transport capacity, walking/cycling capacity and road network capacity."*..... *"Measures to promote sustainable travel"* *"Measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms"* *"Ways of encouraging environmental sustainability by reducing the need to travel"* *"Measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads."*

4.3 The proposal fails to make adequate provision for proposed measures to improve access by walking and cycling.

Whilst four 'possible' permissive routes are indicated these are of limited length and are not considered particularly meaningful in relation to the scale of the development and weaknesses in local connectivity.

REASONS

Reason 1. The proposal fails to adequately comply with paragraphs 92, 104 and 112 of The National Planning Policy Framework 2021:

Section 8 "Promoting healthy and safe communities

Para 92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling."

Section 9. "Promoting sustainable transport

Para 104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued;"

Para 112. "Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;"

Reason 2. The proposal is as such contrary to the following development plan documents: Policy COM 7 of the East Cambridgeshire District Council Local Plan Adopted April 2015; Policy DM2 parts K&L, DM37, DM 44 and DM45 of the Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (2015); and Policy 10 of the Fordham Neighbourhood Plan 2018.

Please see appendix FCWG-1 for the relevant policy extracts.

Reason 3. The proposal fails to comply with Government Planning Practice Guidance on 'Travel plans, transport assessments and statements in decision-taking' which states that a TA or TS should contain *"Measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms"* *"Ways of encouraging environmental sustainability by reducing the need to travel"* *"Measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads."*

Reason 4. The proposal fails to adequately follow the guidance contained in the East Cambridgeshire District Council Supplementary Planning Document - Design Guide Adopted 2012 Page 50 Pedestrians. Routes should: ... *"Link to the surrounding area by utilising existing, or creating new, Rights of Way and bridleways"*.

Reason 5. In the event of Draft NPS EN-1 becoming government policy, there will be a need to show adequate compliance with the following: *"Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling ... "*

5 REQUEST FOR ADDITIONAL PERMISSIVE ROUTES

5.1 FCWG have scoped settlements within 3 miles of the extensive DCO area. All 15 of them, offer scope for improved circular, or linear routes for walking and cycling between them. The settlements included are Burwell, Wicken, Soham, Exning, Newmarket, Isleham, Fordham, Snailwell, Chippenham, Freckenham, West Row, Worlington, Mildenhall, Barton Mills and Red Lodge.

5.2 The DCO boundary gives the opportunity for permissive routes along the routes shown green on Figure FCWG1.

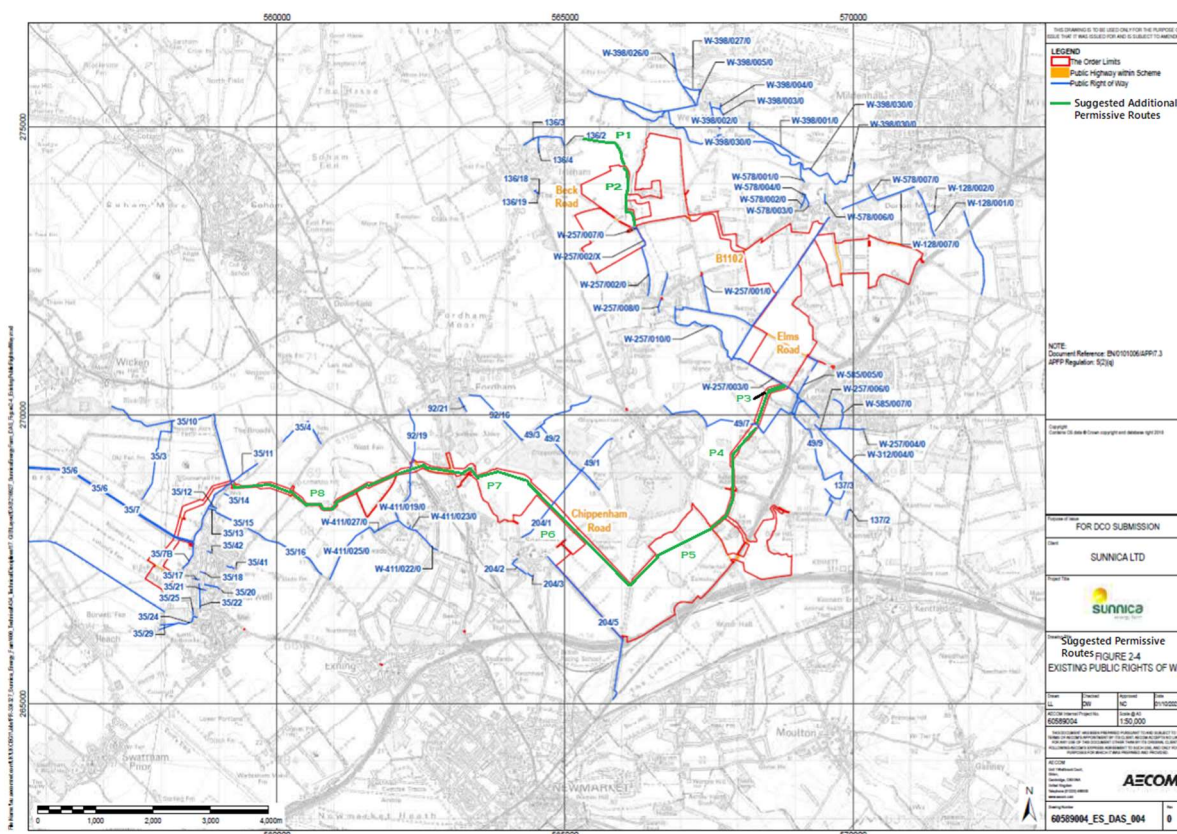


Figure FCWG1

5.3 The introduction of these eight paths P1 to P8 would significantly improve the network of walking and cycling routes in the locality. It would offer positive contributions to climate change and the promotion of active travel. It would demonstrate compliance with the policies and advice contained in appendix FCWG-1. The proposed links are shown in greater detail overlaid on the applicants plans at appendices FCWG-2 and FCWG-3.

6 STATEMENT OF COMMON GROUND

6.1 No agreement of common ground has yet been reached between the Fordham (Cambs) Walking Group and Sunnica. In essence, I can spot some common ground in the principal sources of Government Policy and development plan documents. Our differences lie in which applicable individual policies and parts thereof should be applied and the extent to which they may or may not have been satisfied.

6.2 FCWG sent an email to the Sunnica Project Director on 4th November 2022 seeking information from their team. On the Inspectorate's accompanied site inspection of 3rd November 2022, it was explained that Sunnica are currently in discussions with landowners with a view to reaching agreement for the cabling

route. I was requested to put my question *“Is there any reason why these discussions cannot include the creation of permissive footpaths or bridleways along the cabling route?”* in writing for a considered response.

6.3 The FCWG email also drew attention to missing links considering the shortage of attractive linear and circular routes in the locality. Since it is the case that non-vehicular users favour safe, attractive, PROWs and class C or unclassified roads, Sunnica were asked if they could generate a drawing highlighting these and their “potential” permissive routes to aid understanding.

6.4 The email of 4th November also invited dialogue towards a statement of common ground. No response to the email on any of the points raised has been forthcoming.

7 Conclusion

7.1 This written statement highlights the applicant’s failure to adequately assess the existing network of walking and cycling routes in the locality. As such, the applicant fails to identify the gaps in the current network of walking and cycling routes. Consequently, the proposal fails to make adequate provision for proposed measures to improve access by walking and cycling.

7.2 The applicant has failed to respond substantively to the policies and advice referred to relation to improved facilities for walking and cycling.

7.3 The applicant is urged to amend the proposals within the DCO insofar as they relate to permissive routes. In the event of a failure to respond, the Inspector and in turn the Secretary of State are urged to consider if consent might be withheld or what additional appropriate mitigation requirements might be attached if minded to grant development consent.

7.4 The local communities are feeling threatened and potential sense of isolation because of the amount of development proposed. Decision makers are requested to consider whether further mitigation measures may be required mitigate the adverse socio-economic impacts of the development. Particularly, to improve walking and cycling facilities for visitors and the local community alike.

Appendix FCWG-1

SUNNICA WALKING & CYCLING ROUTES - RELEVANT PLANNING POLICIES AND ADVICE

NPS-EN-1 5.12.9 *“The IPC should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike”.* NOTE – The Secretary of State is now the decision maker rather than the IPC.

Draft NPS EN-1 5.14 *“Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling ... ”*

The National Planning Policy Framework (NPPF) 2021

Section 8 *“Promoting healthy and safe communities*

Para 92. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Open space and recreation para 100. *“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails”.*

Section 9. *“Promoting sustainable transport*

Para 104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c)

opportunities to promote walking, cycling and public transport use are identified and pursued;”

Para 112. *“Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;”

East Cambridgeshire District Council Local Plan Adopted April 2015. Policy COM 7: Transport Impact, which states that *“Development should be designed to reduce the need to travel, particularly by car, and should promote sustainable forms of transport appropriate to its particular location. Opportunities should be maximised for increased permeability and connectivity to existing networks, Development proposals shall: ... b. Provide a comprehensive network of routes giving priority for walking and cycling.”*

Forest Heath District Council Core Strategy Adopted 2010 Policy CS12: Strategic Transport Improvement and Sustainable Transport Spatial Objective T1: *to ensure that new development is located where there are the best opportunities for sustainable travel and the least dependency on car travel.*

Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (2015)

Policy DM2 K&L to: *“produce designs that provide access for all, and that encourage the use of sustainable forms of transport through the provision of pedestrian and cycle links, including access to shops and community facilities; and produce designs, in accordance with standards, that maintain or enhance the safety of the highway network”.*

Policy DM37: *“Public Realm Improvements Proposals for major development or redevelopment in the towns and Key Service Centres will, where reasonable and necessary to the acceptability of the development, be required to provide or contribute towards public realm improvements appropriate to the scale and nature of the proposal”.*

Policy DM44: *“Rights of Way Development which would adversely affect the character of, or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which*

are at least as attractive, safe and convenient for public use. This will apply to rights of way for pedestrian, cyclist, or horse rider use. Improvements to such rights of way will be sought in association with new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate and to achieve the objectives of the Suffolk Rights of Way Improvement Plan”.

DM45: Transport Assessments and Travel Plans Policy DM45: “.... Where a Transport Assessment and/or Travel Plan does not demonstrate that the travel impacts arising from the development will be satisfactorily mitigated or that adequate measures are in place to promote the use of more sustainable modes of transport, then planning permission will not be granted. ...”

FORDHAM Neighbourhood Plan 2018

Policy 10 Pedestrian Access & Public Rights of Way extract: “ ... Development proposals that will enhance or extend an existing public right of way or that will deliver a new public right of way in a suitable location will be viewed favourably.

Development proposals that are located where there is an opportunity to link two or more public rights of way or to enhance connectivity through the village should incorporate this connectivity through the proposal wherever appropriate. ...”

Government Planning Practice Guidance on ‘Travel plans, transport assessments and statements in decision-taking’ states that a TA or TS should contain an “Assessment of public transport capacity, walking/cycling capacity and road network capacity.”..... “Measures to promote sustainable travel” “Measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms” “Ways of encouraging environmental sustainability by reducing the need to travel” “Measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads.”

East Cambridgeshire District Council Supplementary Planning Documents -

Design Guide Adopted 2012 Page 50 Pedestrians. Routes should: ... “Link to the surrounding area by utilising existing, or creating new, Rights of Way and bridleways”.

Suffolk Green Access Strategy Rights of Way Improvement Plan (ROWIP)

2020 – 2030 has an objective to develop healthy and sustainable communities by addressing: “How green access can be embedded in the health agenda and

how green access can contribute to our physical and mental wellbeing. How working with communities can make people healthier. How planning of developments can allow for green access, both within and outside the development site”.

‘Cycling and walking for individual and population health benefits’ Public Health England 2018

Offers the following advice for decision makers:

“Over 4 in 10 women (42%) and 1 in 3 men (34%) in England are not active enough for good health, with human and economic costs for the individual, communities and the health and social care system. The most recent estimates are that physical inactivity costs the NHS more than £450 million a year at Clinical Commissioning Group level, equating to £817,274 per 100,000 individuals or £8.17 per person.

This rapid evidence review is intended for health and social care policy makers, decision makers and commissioners and attempts to address the following question: “What is the impact of walking and/or cycling on different health outcomes?” This review found that walking and cycling benefit health in a number of ways:

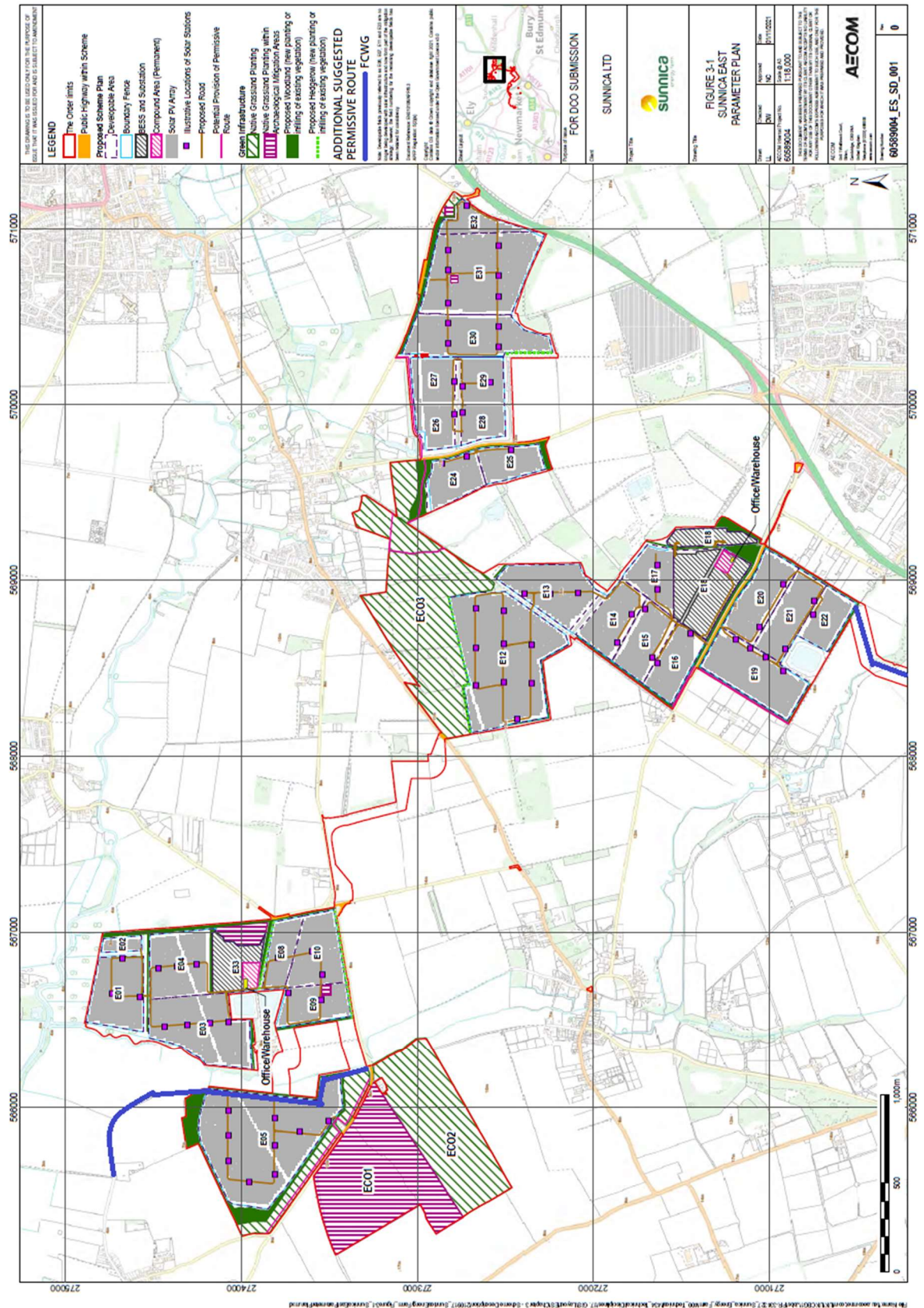
- people who walk or cycle have improved metabolic health and a reduced risk of premature mortality*
- walking and cycling reduce the risk factors for a number of diseases, including cardiovascular disease, respiratory disease, some cancers, and Type II diabetes*
- walking and cycling also have positive effects on mental health and general wellbeing. The mental health and neurological benefits include reduced risk of dementia, improved sleep quality, and a greater sense of wellbeing*
- in environmental terms, health benefits accrue for the general population from a reduction in pollution due to car use and a decrease in road congestion*
- the evidence is that the health benefits of walking and cycling outweigh any potential health risks and harms – for example from injury or pollution The weight of evidence suggests that if walking and cycling can be increased, they have potential to lead to important health gains at the population level, and thus benefit the NHS and the wider health and care system.*

... The UK Government has a stated ambition for “cycling and walking to become the norm by 2040” (Cycling and walking investment strategy 2017) and will target funding at innovative ways to encourage people onto a bike or to use their own 2 feet for shorter journeys. This includes specific objectives to double cycling, reduce cycling accidents, and increase the proportion of 5-to-10 year olds walking to school to 55% by 2025”.

HM Government Net Zero Strategy: Build Back Greener 2021

Objective and policy for £2 billion investment which will help enable half of journeys in towns and cities to be cycled or walked by 2030.

Appendix FCWG-2 Sunnica East Suggested Additional Permissive Routes



Appendix FCWG-3 Sunnica West Suggested Additional Permissive Routes

