



Rocklands Parish Council

Looking After Our Community

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39 Long Street
Great Ellingham
Norfolk
NR17 1LN
16 July 2025

Planning Policy Team
Breckland District Council
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE

Dear Sir or Madam,

Rocklands' Response to the Breckland Local Plan Questions – Pre Regulation 18 Consultation

Please find attached, Rocklands Parish Council's response to the questions posed to town and parish councils at the '*round table*' event which some of our councillors attended on 10 June 2025.

We would be very grateful for confirmation of receipt.

Yours faithfully,

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(Clerk to Rocklands Parish Council)

Philip Leslie
Chairman, Rocklands Parish Council

cc Gemma Manthorpe – Planning Policy Manager
Andrew D'Arcy – Principal Planning Policy Officer
Cllr Sarah Suggitt – Deputy Leader, Breckland Council
George Freeman MP (*Case Ref: ZA50592*)

Rocklands Parish Council

Response to Questions

Breckland Local Plan

Pre Regulation 18 Consultation

Background

Following the Local Plan Update meeting held at Elizabeth House on 20 May 2025 (attended by two of our councillors) and the subsequent 'round table' meeting at the same venue on 10 June 2025 (attended by four of our councillors), a public Rocklands Parish Council (RPC) meeting was held on Saturday 12 July at Rocklands Village Hall – to seek the views of our residents on the six questions which had been posed by Breckland Council. Also, to discuss the sites which had been put forward in the combined 2024/25 repeated 'Call for Sites' exercises.

Breckland Councillor Sarah Suggitt was also in attendance – to hear views, answer questions and offer some clarification.

Breckland had been given some initial thoughts, from those Rocklands councillors attending the June meeting – by way of an annotated map. This document aims to significantly expand on those.

Preliminary Matters

The Six Questions

Although feedback at this stage is prior to the statutory Regulation 18 Consultation, due in Autumn, RPC feel that the six questions posed by Breckland Council (some leading) should not be the limit of our representations at this stage, and our feedback should in no way be directed by the Council.

Therefore, this document covers a number of issues beyond what has been asked of us.

Particularly, Breckland Council should be aware of the very strong feelings amongst residents about how the allocation of sites, and the Local Plan review processes, are being expedited.

Settlement Boundaries

The previous consultation document on 'Preferred Options' (June 2024) effectively dismissed the retention of Settlement Boundaries.

However, the 'Issues and Options Feedback Report' (May 2024) stated that, of 184 responses from consultees, 53% wished to retain Settlement Boundaries – with just 21% positively wanting to remove them.

In spite of the above, Breckland have since repeatedly stated that they intend to remove them. They have cited that removing them will prevent communities from having to accommodate developments in unsuitable locations within the boundary. This justification has little credibility – as such situations could readily be prevented by effective policy on development location suitability in rural locations.

RPC consider this move to be undemocratic - what is the point of consultation when a significant majority is wholly ignored? Settlement Boundaries in rural locations are a powerful defence against inappropriate development. There are some parishes which have no problem with losing their settlement boundaries for various practical reasons – but there should not be a single indiscriminate unilateral policy.

For the purposes of ongoing consultation, RPC will continue to use the existing Local Plan policies and reference Settlement Boundaries where appropriate.

Strategic Flood Risk Assessment

The SFRA is a key reference for the Local Planning Authority (LPA) when making decisions about planning applications, and other matters. In the course of developing the new Local Plan, Breckland undertook to review the SFRA – to ensure that it was up to date and still correctly reflected the flooding risks in the District.

Hitherto, in the course of reviewing and updating the SFRA, Breckland had done so without consulting community representatives. However, on this occasion, RPC, some other town and parish councils, and some flood groups lobbied that they be consulted in the latest review.

On 2 July 2024, RPC took part in an online meeting with the consultants retained by Breckland to carry out the Level 1 SFRA review. Other parishes/town councils took part – together with representatives from the LLFA, Environment Agency, other agencies and Breckland officers. RPC had supplied extensive information and photographs to the consultants in advance, and expanded significantly on this in the course of the meeting.

After some considerable time, on 4 March 2025, a copy of the new Level 1 SFRA was made available to us. It appeared that a draft copy had been previously made available to selected stakeholders (e.g. the LLFA) for comment – but not to town/parish councils or flood groups.

On examining the new SFRA, Rocklands is mentioned only twice – in relation to “Surface water/drainage system blockage/failure” (Jun 2017-Jan 2018) and “Surface water/drainage system blockage/failure, some fluvial flooding” (Winter 2020/21).

RPC consider that the new Level 1 SFRA does not correctly reflect the decades-long surface water flooding issues in Rocklands, and it is therefore of very little utility when used to inform development in Rocklands.

RPC has made initial representations to the Breckland Planning Policy team, and will pursue this matter until satisfactorily resolved.

Procedurally, it is not normal practice for the LPA to consult the Lead Local Flood Authority (LLFA) if a planning application does not comprise 10 dwellings or more. Local experience however, has shown that developments of less than 10 dwellings, in critical locations, can significantly exacerbate or lead to significant surface water flooding.

In discussion with LLFA officers at meetings/multi-agency meetings in Rocklands, it has been suggested that, where RPC highlights that an application could potentially give rise to flooding issues, the LPA should consult the LLFA in these cases.

The above has never been formalised. Therefore, RPC requests that this arrangement is formally acknowledged and implemented by Breckland Council.

Potential Development Sites

General

- The vast majority of the proposed development sites in Rocklands require access via narrow, unclassified roads/lanes – many of which have no passing places, no pavements and no street lighting. Rocklands is particularly characterised in this respect by its almost total lack of pavements. Indeed, even if one wished to install a new pavement, in virtually all cases, due to the presence of existing properties and the narrowness of the roads, this would be impossible.

Para.115 - ‘Considering development proposals’ of the NPPF requires that, *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:”* “b) *safe and suitable access to the site can be achieved for all users;*”

and

Para.116 - *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety..”*

It is clear that pedestrian access along many of the unclassified roads/lanes associated with the proposed development sites – to access e.g. local services (shop, post office, café, pub, village hall, playing field) – is manifestly unsafe.

It is also clear that vehicular access in these cases is fraught with safety issues – particularly where there are no passing places.

The MHCLG and DfT publication *Manual for Streets* advises that a minimum surfaced width of at least 4.1 m is required for two cars to pass each other with care. In the vast majority of cases, this cannot be achieved.

Overall, such situations are contrary to LP policy COM 01(b).

North of Chapel Street (LPRC4SDEV365)

Firstly, as advised in our response to the first Regulation 18 Consultation, this site is mis-named. Its location is North of Bell Road – not Chapel Street. Reference to the Electoral Register will confirm.

Application Refused - 3PL/2023/0702/F – development (single property) represents visual intrusion and erosion of the open countryside.

Appeal Dismissed (HMPI) - APP/F2605/W/24/3336843 - the site (single property) is neither adjacent, or connected, to the Settlement Boundary; in open countryside; would erode and urbanise the open, rural character of the appeal site; development would result in harm to the character and appearance of the area, contrary to LP Policies COM01, GEN02, GEN05 and ENV05.

Site is unsustainable. Access to village services, and school bus, is via Bell Road (actually a country lane), Chapel Street (narrow, with 3 blind bends) and The Street – none of which have pavements for pedestrians. Bell Road and the Northern end of Chapel Street have no street lighting. Access involves crossing a very busy road at a dangerous junction, with no pedestrian crossing. RPC monitoring equipment shows significant speeding problems on the B1077 and The Street.

The walking distance to any of the village services is significantly in excess of the 800/1200 m *acceptable walking distance* recognised in a previous Breckland Local Service Centre Topic Paper, and other LP documents. As such, the requirement in the draft Local Plan – 4.12 'Accessibility' “.. *development proposals should be located within easy reach of a range of services (via walking, cycling and public transport).*” is not met. This in turn requires the use of motor vehicles, and therefore counter to the aim to reduce carbon emissions. The volume of traffic on these narrow roads is therefore increased.

Access from the West is via the very narrow (unclassified) Bell Road – which varies in width from 2.5 - 2.9 m, has no formed passing places, has blind bends, no street lighting and is frequented by large agricultural vehicles. The MHCLG and DfT publication *Manual for Streets* advises that a minimum surfaced width of at least 4.1 m is required for two cars to pass each other with care.

Sewerage – Anglian Water advised the community at public meetings that the sewer (and pumping station on Chapel Street) serving the first few houses in Bell Road, Chapel Street, Attleborough Road and Thieves Lane, has been sized only to accommodate discharges from existing properties – it has no spare capacity.

Water pressure – existing properties on Bell Road suffer from very low water pressure.

Land South of Bell Road, Rockland St Peter (LPRC4S25DEV059)

Whilst this site is adjacent to the Settlement Boundary, it is outside the built form of the village and development would be contrary to LP policy GEN 04.

The sheer scale and size of the proposed development is in no way in keeping with the scale and size of the settlement. 115 dwellings would represent a 47% increase in the number of dwellings in the main village, and would therefore totally skew the balance, hardly inspire the community, and completely alter the character of the village. The appeal of this side of the village lies in its simplicity – a peaceful, close-knit place with a genuine rural character, a slower rhythm of life, a lack of noise or rush. The numbers of motor vehicles using the narrow access roads from either direction would be completely untenable.

[illegible][illegible]

As with the previous proposal, the site is unsustainable. Access to village services, and school bus, is via the unclassified Bell Road, Chapel Street (narrow, with 3 blind bends) and The Street – none of which have pavements for pedestrians. Bell Road and the Northern end of Chapel Street have no street lighting. Access involves crossing a very busy road at a dangerous junction, with no pedestrian crossing. RPC monitoring equipment shows significant speeding problems on the B1077 and The Street.

The walking distance to any of the village services is significantly in excess of the 800/1200 m “*acceptable walking distance*” recognised in a previous Breckland Local Service Centre Topic Paper, and other LP documents. As such, the requirement in the draft Local Plan – 4.12 ‘Accessibility’ “*.. development proposals should be located within easy reach of a range of services (via walking, cycling and public transport).*” is not met. This in turn requires the use of motor vehicles, and therefore counter to the aim to reduce carbon emissions. The volume of traffic on these narrow roads is therefore increased.

Access from the West is via the very narrow unclassified Bell Road – which varies in width from 2.5 - 2.9 m, has no formed passing places, has blind bends, no street lighting, and is frequented by large agricultural vehicles. Access for emergency vehicles would be virtually impossible. The MHCLG and DfT publication *Manual for Streets* advises that a minimum surfaced width of at least 4.1 m is required for two cars to pass each other with care.

Sewerage – Anglian Water advised the community at public meetings that the sewer (and pumping station on Chapel Street) serving the first few houses in Bell Road, Chapel Street, Attleborough Road and Thieves Lane, has been sized only to accommodate discharges from existing properties – it has no spare capacity.

Water pressure – existing properties on Bell Road suffer from very low water pressure.

5-13 The Street, Rocklands (LPRC4S25DEV058)

This site is adjacent to the Settlement Boundary.

Development at this site – for variously, 1, 2, 3 and 4 dwellings – has repeatedly been Refused. See 3PL/2023/1027/F, 3PL/2023/1024/F, 3PL/2016/0312/F, 3PL/2015/0601/F.

HMPI Dismissed an Appeal – APP/F2605/W/16/3166307 – stating, “*The appeal site is part of the undeveloped area that performs an important role in separating the two distinct parts of The Rocklands..*” “*..would unacceptably erode the undeveloped gap between the settlements to the detriment of the character and appearance of the area and undermining the role played by the site as part of the undeveloped space between the settlements.*”

Some residents, however, feel that if fewer than the suggested 5 properties were located to only the front of the site – thereby continuing the linear nature of existing development – that could be in keeping with the existing character of the area, as long as the designs were appropriate. Conditions would be required to prohibit any future backland development.

Land at The Street, Rocklands (LPRC4SDEV065)

This site is adjacent to the Settlement Boundary.

The site is subject to surface water flooding in periods of heavy rainfall. See the images below – showing surface water flooding from this site, and to the West down The Street:



The site is entirely Greenfield in nature.

The site is at the 3-way junction of Rectory Road, Magpie Lane and The Street.

Visibility for egress is exceptionally poor – Magpie Lane curves away to the right with significant vegetation to obscure the view. Egress would be unacceptably hazardous.

Magpie Lane is a very narrow, single track unclassified lane with few passing places, no pavement and no lighting – frequented by large agricultural vehicles. There are often vehicle-vehicle and vehicle-pedestrian conflicts on this lane, and many residents try to avoid it by taking a much longer alternative route in their vehicles. Pedestrians traverse this lane with trepidation.

Rectory Road is a narrow unclassified road with no passing places, no pavements and no lighting.

Access to the primary school and village services is via The Street – which narrows significantly at this point, and has no pavements (except directly outside the school).

There would be unavoidable Visual Landscape Impact – particularly with respect to neighbouring properties, and from the rear aspect of properties on The Street and Magpie Lane. These properties would lose the current amenity of unrestricted views of the surrounding rural landscape.

Magna Farm, Magpie Lane, Rocklands (LPR/C4S/DEV/251)

This site is a considerable distance outside the Settlement Boundary, and was categorised as 'Discounted' in the Phase 2 Site Assessments of June 2024.

Access to the site would be via Magpie Lane – with all of the associated issues and hazards detailed above.

The proposed site would constitute backland development, and not conform to the generally linear form of the village.

Area 2, West of Rectory Road, Rockland All Saints (LPR/C4S/DEV/403)

This site is outside the Settlement Boundary, and not adjacent to it.

Development would erode the rural character of the site – currently used for grazing cattle – and, being in an elevated position, would result in significant visual impact to properties on Magpie Lane, Rectory Road and The Street.

Access to the site would be via Rectory Road (a narrow unclassified road with no passing places, no lighting, and no pavement) and either via Magpie Lane (another narrow unclassified road with few passing places, no lighting, and no pavement), or The Street (which has no pavement).

Access to village services would be via Rectory Road and The Street – which has no pavement, except a very short length outside the school, and no lighting in the first part.

Area 1, East of Rectory Road, Rockland All Saints (LPR/C4S/DEV/062)

This site is outside the Settlement Boundary, and not adjacent to it.

This would represent unacceptable infilling in a rural setting.

The two, relatively new, detached existing dwellings adjacent to this site were only granted following the granting of a part Q conversion of an agricultural barn (to a pair of semi-detached) under Permitted Development. The part Q application clearly being subsequently used as a planning 'wedge'.

Further development on this site would only serve to significantly harm a quiet rural setting.

We understand that the private access road is owned by a third party, and that there is no automatic right of passage.

Access to the site from the North would be via Rectory Road (a narrow unclassified road with no passing places, no lighting, and no pavement) and either via Magpie Lane (another narrow unclassifieds road with few passing places, no lighting, and no pavement), or The Street (which has no pavement).

Access from the South would be via Rectory Road, and either Fen Street, Stowlay Lane or Church Hill – all of which are very narrow unclassified rural lanes with no lighting and virtually no passing places.

Access to village services would be via Rectory Road and The Street – which has no pavement, except a very short length outside the school, and no lighting in the first part.

Area 3, West of Rectory Rd, Rockland All Saints (LPR/C4S/DEV/404)

This site is far outside the Settlement Boundary, and not adjacent to it.

Development would erode and urbanise the rural character of the site, and would result in harm to the character and appearance of the area, contrary to LP Policies.

The proposed development would most certainly not be in keeping with the completely linear pattern of a small number of principally ex-authority dwellings on Rectory Road – resulting in an effectively mini-housing estate in an open rural setting.

At a significantly elevated position, this development would have serious visual impact on properties already on Rectory Road, to those on Magpie Lane, and surrounding rural lanes..

Access to the site from the North would be via Rectory Road (a narrow unclassified road with few passing places, no lighting, and no pavement) and either via Magpie Lane (another narrow unclassified road with few passing places, no lighting, and no pavement), or The Street (which has no pavement).

Access from the South would be via Rectory Road, and either Fen Street, Stowlay Lane or Church Hill – all of which are very narrow unclassified rural lanes with no lighting and virtually no passing places.

Access to village services would be via Rectory Road and The Street – which has no pavement, except a very short length outside the school, and no lighting in the first part.

Six Questions

1. Which proposed sites do you think are the most suitable?

- Rocklands Parish Council (RPC) do not believe that *any* of the proposed sites are acceptable – for the reasons set out above.
- At the public meeting, and in correspondence received, no-one thought that any of the sites are acceptable – for the same reasons.
- It was emphasised to Cllr Suggitt that Rocklands residents are not NIMBYs – the numbers of new dwellings in Rocklands were now in excess of 150% more than the housing allocation set out in policy HOU 04 of the current Local Plan. RPC do not object to additional dwellings in the right places, where they will not contribute to (or exacerbate) the significant flooding issues, have safe and reasonable access to the village services, and of designs commensurate with the local vernacular.

2. What size houses do you think that your village needs?

- If any housing development were to occur in Rocklands (but suitable sites extremely difficult to identify), the village needs smaller-sized (1-2 bed) housing and a focus on affordable/social housing tenures to meet local needs, enabling younger people to stay in their village. There is also some support for housing for older and disabled persons, including sheltered housing for those 60+ to encourage downsizing.
- It is emphasised that new homes should be of an appropriate size for the existing settlement to maintain a balance, and that 'small local developments' are preferred. The objection is against large, expensive properties that do not cater to the genuine local need. The idea of a "*commuter ghetto*" that doesn't support the rural young or local jobs is strongly opposed.

3. Are there any community facilities that could benefit from s106 money?

- At the public meeting, a slide was displayed to explain to residents the somewhat messy matter of Section 106 planning obligations. Extensive discussion followed – focussing particularly on how s106 funds are (*mis?*)managed, the threshold at which developers are obliged to pay, the means that many developers use to positively evade payment, and the (very low) likelihood that the parish would ever see any s106 money. By comparison, the guaranteed funds to the parish generated by CIL (not a substitute for s106) were explained – but that Breckland Council had resolved not to implement CIL.
- Overall, residents felt that their intelligence was being insulted by an attempt to use the thinly veiled *bribe* of s106 money.
- In the highly unlikely event that s106 money became a reality, facilities such as the Village Hall, Sports facilities, Community Shop could benefit. Also, funding of flood mitigation measures is also a critical consideration.

4. Would you take on open space if it is provided?

- RPC has already submitted such an area in the previous 'Call for Sites' exercise – land at the end of Wayland Road.
- Indeed, in working with the Lead Local Flood Authority (LLFA) on natural flood mitigation (NFM) measures for the village, the LLFA have recently identified this site for the location of an attenuation lagoon – offering the greatest benefit in flood relief for the village. If designed correctly, the facility could also offer a sensitively designed nature area – attracting a variety of flora and fauna – for the benefit of the school children and residents alike.
- At the public meeting, and beforehand, the issue of maintaining such an area was raised. It was considered that increasing the parish precept to cover this was unrealistic – and that if funds could not be secured from local government grants or elsewhere, it was likely to become untenable. Cllr Suggitt confirmed that maintenance of additional open spaces would have to be taken-on by the parish council.

5. Could any of the sites offer improvements to public rights of way?

- None of the proposed sites currently incorporate public rights of way (PoR), and could not usefully add new ones which would have any practical benefit. Norfolk County Council have previously admitted that, although they have a duty to maintain PoR, in many cases they do not as they simply don't have the resources to do so.

6. What benefits do you think development could bring to your village?

- Whilst it has to be recognised that more residents have the potential to generate more income for the Community Shop/ Post Office/Café and the Pub, at the same time, the village primary school is at full capacity for years ahead, and local doctors' surgeries are overwhelmed.
- Any benefits would be hugely outweighed by the damage that would be inflicted on our community by any significant development.

Other

As expressed in previous consultation responses, Rocklands Parish Council does not accept the means by which Breckland Council seeks to achieve the *mandatory* housing targets handed-down by Government. It is little different to those employed in the previous Regulation 18 Consultation, under the previous Government.

The belief that each rural village should be forced to expand to take their *fair share* of the housing requirement, is naive in the extreme, a blunt instrument and, quite frankly, *lazy planning* (a view expressed

by two different long-serving town and country planning officers at two of the earlier *workshops*). It particularly takes little account of a community's actual needs, topography, or its physical ability to grow. The imposition of housing numbers adds nothing to 'Inspiring Communities' (draft LP – 3.5.1).

There is a revised 'Parish Settlement Hierarchy' system which, amongst other things, will be used to decide the housing numbers to be imposed on communities – but again, this reduces the exercise to algorithms and modelling, ignoring the practicality of proposed sites and *actual* local needs.

In a recent response to an enquiry by RPC, including housing allocation, the Director of Planning and Building Control responded:

"As we explained at the meeting, the numbers to be allocated for the rural areas is very dependent on the number of Strategic Development Areas (SDAs) that we can bring forward, together with the number of houses they can deliver and the trajectory/timeframe in which those numbers can be delivered.

We have set out to the promoters of the SDAs that we expect a suite of information by the end of July and that will help us establish the total number of houses to be delivered in the rural areas. We then need to look, based on the settlement hierarchy as to the distribution of that residual. It is likely that work will be completed in early August.

Whilst I fully appreciate the desire to know that number, for the reasons set out above, that is not possible at this stage. What is clear is that given the high mandated number of houses we are required to deliver, together with the need to provide a five year housing land supply, there will likely be a requirement for our rural parishes to deliver a significant number of houses."

The phrase, "*..distribution of that residual.*" if nothing else, simply reinforces the concept that small local communities are being used indiscriminately as *dumping* grounds for excess housing numbers that cannot be achieved elsewhere.

The apparent inability to control the promoters/developers of SDAs – who may not meet expected delivery rates and/or housing numbers – appears to result in small rural communities being hit ever harder. Hardly "*..inspiring..*"!