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17 February 2024

Planning Policy Team
Breckland District Council
Elizabeth House
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Dear Sir or Madam,

Rocklands' Response to the Breckland Local Plan Consultation – Winter 2023/2024

Please find attached, Rocklands Parish Council's response to the above phase of the consultation – including Development Strategy Options.

We would be very grateful for confirmation of receipt.

Yours faithfully,

pp  (Clerk to Rocklands Parish Council)

David Howie
Chairman, Rocklands Parish Council

cc Andrew D'Arcy – Principal Planning Policy Officer

Rocklands Parish Council

Response to Breckland Local Plan Consultation – Winter 2023/2024.

Following an open public meeting in the Village Hall, on Saturday 27 January 2024 – where 125 persons attended – Rocklands Parish Council responds to this phase of the consultation as follows:

1. Sustaining rural community services – and Local Service Centres

“Do you agree with the methodology for deciding which parishes should be Local Service Centres?”

Answer: **NOT ENTIRELY**

Whilst the five principal criteria are generally applicable, the way in which they have been applied is far too crude. For example, in some cases, schools have been categorised as employing more than 10 persons – but this includes staff who work for only one or two hours per day or week e.g. catering and cleaning staff. Such employees may also be employed part-time by other schools or businesses e.g. where two schools or more are federated and share heads, teachers and support staff. In such a scenario, these persons will be *double-counted*.

A more accurate approach would be to measure by Full Time Equivalents (FTE's).

No account is taken of the accessibility of community facilities, shops, post offices. By definition, users will have to travel by some means to access *Service Centres*. Whilst more customers are essential if these facilities are to thrive and remain viable, where those travelling by car are going to park can be a significant issue. For example, pubs with car parks will have no such issues – whilst shops with no car parking, on a narrow street/lane with no pavements, could very quickly lead to significant obstructions, safety issues, and have detrimental impact on the amenity of neighbours. Somehow, a balanced approach needs to be applied.

A concept of 'catchment area' also needs to be applied – identifying a *critical mass* necessary for a Service Centre to be viable, whilst minimising distances travelled.

2. Defining Settlements

“Should Breckland continue with a settlement boundary approach or develop a robust criteria-based policy?”

Answer: **Continue with a Settlement Boundary approach**

Policy requirements on defining rural settlements will, of necessity, vary according to the size and location of any particular settlement – and any protected characteristics. This should not be down to a simple binary choice on policy. The ethos of the Localism Act was always to devolve more decision-making to local communities – some may decide that they want or wish to retain a settlement boundary, some may not e.g. if they are keen to develop more employment opportunities locally.

One disadvantage of settlement boundaries quoted in the consultation paper is *“Detailed analysis of each settlement could be time consuming both to prepare and for residents and landowners to review and comment and once agreed are inflexible to meeting changing housing needs in a locality.”*

“..time consuming..” should not be an issue. It implies care in decision-making. Efforts to simply make things easier is, as a delegate (*a qualified town planner of 30 years experience*) at a recent workshop opined, *“..lazy planning..”*.

Further, from our local experience, modifying our settlement boundary to accommodate changes in local requirements, was not a great issue and certainly not inflexible.

As far as Rocklands is concerned, our settlement boundary is absolutely vital to protecting our community from inappropriate uncontrolled development by predatory developers, and those wishing to turn a quick profit.

Policies already exist which permit, where appropriate and subject to conditions, development outside of settlement boundaries e.g. Class Q of the Town and Country Planning (General Permitted Development) Order 2015 - a type of permission that allows the development of agricultural buildings into residential dwellings.

Reference to “..a robust criteria-based policy..” suggests that further decision-making will be taken away from local communities, and left with planners and planning committees to place their interpretations on.

It is not at all clear from the supporting documentation what these criteria-based elements are/would be... Are they the 15 criteria which have been applied to the phase 1 assessments of the *Call for Sites* exercise? If they are, they are currently seriously wanting.

For example, **flooding** (from surface water, rivers etc.) – a very serious issue in a number of areas of our district – is entirely missing from these “..robust criteria..”. There are certainly some proposed sites which almost immediately disqualify themselves from consideration due to such issues.

Also, there appear to be no *weightings* given to each of the criteria. Most certainly, some are more significant than others – and general subjective assessments appear to have been made based on unexplained elements.

Finally, in some of the development scenarios proposed, there appears to be the belief that *all* communities with settlement boundaries – irrespective of local need, location, size, character etc. - should be prepared to expand to accommodate *their fair share* of the housing quota. This, again, is an inadequate *blunt instrument* approach to the distribution of housing, with potential to seriously harm some communities.

If it is perceived that *all* communities with settlement boundaries have the capacity to expand, then we will lose the character of those settlements, they will cease to be villages and hamlets, and the entire rural character of Breckland will be gone for ever.

We would take the opportunity to point out that the consultation document supporting this section is titled ‘*Approaches to defining settlements and protecting the countryside from development*’ – whereas it is elsewhere referred to as ‘*Approaches to defining settlements and protecting the countryside from inappropriate development*’ – we suspect that the latter was the intention.

‘A Review of Villages with Boundaries’

We would like to query/correct some of the analyses you have carried out for the parish of Rocklands:

- On pages 29 and 30, you have published your review of ‘The Rocklands’.. We don’t know where our parish got this title (*was the document produced by someone not familiar with Breckland District?*), but our name is simply ‘Rocklands’.
- Against ‘Growth Indicators’ are some puzzling entries – ‘*No of planning permissions to date = 1*’ (?), a dislocated planning permission reference etc. – this needs review and accuracy.
- Against ‘Education’ we are shown as having a secondary school (*we don’t*) – but this is recorded as ‘Attleborough Academy’ – which is over 5 miles away...
- Against ‘Cycle and Footpath Routes’ we have a ‘0’ –_whereas Rocklands parish has 4 registered footpaths, and 5 bridleways. Consulting the NCC ‘Definitive Maps’ will confirm.
- Against ‘Churches’, 3 are listed – yet St Andrew’s Church is a ruin – Grade II Listed.
- Against ‘Business and Employment Information’ Rocklands Primary School is listed as having 10 or more staff. The school is federated with Great Ellingham Primary School, and shares a Head, teachers and support staff. Those such as dinner time staff, cleaners etc. work a few hours a week.

It would be helpful and more accurate to record employed persons by FTE (Full Time Equivalent), and this will avoid double-counting persons who work in more than one parish.

- Against 'Water and Utilities' is recorded '*No known capacity issues*'. In fact, the first time sewer recently installed in the St Peter area of the village has a restricted capacity – just for the dwellings that are already there. As Anglian Water informed us in the public meetings, this is limited – and this sewer joins the existing All Saints sewer which is served by the pumping station with specific design capacity.
- **Against 'Flood Risk' the inference that there is none is seriously inaccurate.** See elsewhere in this document for substantial details. Our engagement with Breckland Planning Officers, the Planning Committee, LLFA, MNFP, NSFA etc. should indicate that we have had serious surface water flooding issues in certain parts of our parish for decades.
- Accordingly, Rocklands has 3 of the 5 criteria for a village with boundaries.

3. Alternative development strategy options

"Please drag and move the options below to rank in order of preference, the six alternative development scenarios. Sort in order of importance."

Answer: **C, D, A, B, F, E**

Firstly, we understand that the overall requirement for housing numbers has come from applying the Government's 'Standard Method' – 661 dwellings per annum from Breckland. We also understand that the 'Housing and Economic Development Needs Assessment' (HEDNA) is not yet completed – but will review the numbers from the 'Standard Method' when finished.

The overall principles that we believe should be applied to the development needs assessment are as follows:

- Need - additional housing should be located close to where employment opportunities are/will be located. This will reduce the need to use the car, length of journeys (and therefore reduce environmental impacts), increase use of public transport, cycling, walking.
- Where motorised travel to work is unavoidable, additional housing should be located close to major traffic routes – avoiding 'rat runs' through villages and the countryside.
- Maximum use should be made of the opportunities presented by the redevelopment of Swanton Morley Barracks and the Abbey Estate. This would take the pressure off other communities.
- Rural settlements with little or no employment opportunities should not be forced to grow into '*dormitory*' villages for commuters to employment locations. It is widely recognised that sense of community is often diluted/lost in these circumstances.

We wonder why Swanton Morley Barracks and the Abbey Estate do not feature in all six options?

Again, the approach needs to be more *nuanced*, rather than relying on rigidly restrictive principles.

Communities should be consulted – face to face – in a more detailed manner. At no time during the workshops held so far, have we seen a planning officer. Placing *consultants* between the stakeholders and the Planning department unfortunately suggests a '*box-ticking*' exercise.

We would like to point out that your supporting documentation variously refers to '*four*' and '*six*' development options/scenarios.

4. Potential development sites

"Do you agree with this new criteria for assessing sites?"

Answer: **NO**

As previously stated, **flooding** (from surface water, rivers etc.) – a very serious issue in a number of areas of our district – is entirely missing from these “..robust criteria..”. There are certainly some proposed sites which almost immediately disqualify themselves from consideration due to such issues.

Merely relying on Environment Agency flood maps, and LLFA records is a wholly incomplete process. Much more engagement with the communities affected by flooding, with their local knowledge, is required. In this respect, we now at least have recognition of these issues, and Rocklands – together with the Watton and Saham Flood Action Group – will, as already agreed by Breckland, be engaging with consultants in the review of the Strategic Flood Risk Assessment for development of the new Local Plan.

Rocklands’ pro-active approach in organising multi-agency meetings (LLFA, Anglian Water, Breckland Council, NCC Highways etc), and it’s membership of the Mid-Norfolk Flood Partnership, and liaison with the Norfolk Strategic Flooding Alliance, serve to demonstrate how critical it is to include flooding as one of the criteria for assessing sites.

Also, there appear to be no weightings given to each of the criteria. Most certainly, some are more significant than others – and general subjective conclusions appear to have been made based on undisclosed considerations.

Considering the phase 1 assessments produced for Rocklands parish, and our dialogue already with Andrew D’Arcy and Martin Craddock, we have the following comments to make about each site:

LPR/C4S/DEV/062 – Area 1, East of Rectory Road

LPR/C4S/DEV/403 – Area 2, West of Rectory Road

LPR/C4S/DEV/404 – Area 3, West of Rectory Road

These are collectively addressed, as a confused proposal was originally made for the Rectory Road area – only very recently re-structured. Responses to our queries, from Andrew D’Arcy (Principal Planning Policy Officer), has elicited the following, *“I understand that we are not going to update the published site assessments until reissuing the site analysis work in the Spring to accompany preferred options, now that we have secured confirmation of the areas proposed and intention of the landowner.”*

Notwithstanding the above, we have the following comments:

- Under current policy, the proposed sites are a considerable distance outside the Settlement Boundary, and in no way adjacent or connected to it.

Under the proposed criteria:

- The sites are entirely Greenfield in nature.
- Access to the sites would be via Rectory Road – a narrow *tertiary* road with few passing places. The nearby junction with Magpie Lane – another narrow *tertiary* road with few passing places – and the end of The Street is also very restricted in width. We do not consider that access for additional properties will be either safe or practical.
- Pedestrian access to the proposed sites would be extremely hazardous – there being no pavements, and via a narrow inclined road.
- The Visual Landscape Impact would be High - particularly with respect to neighbouring properties on both sides of the road. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape. As the sites are in an elevated position, development will impact on the rural views currently enjoyed from surrounding properties, roads and footpaths.
- We would argue that the proposed sites are only very tenuously *Adjacent to the existing built-up area*.
- The sites would conflict with the scale and size of the settlement, and would notably grow it.
- The sites are not in proximity to a recognised settlement, and could not form part of a new settlement.

- Although these sites can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development.
- In summary, we contend that these sites should not be accepted for development.

LPR/C4S/DEV/251 – Magna Farm, Magpie Lane

- Under current policy, the proposed site is a considerable distance outside the Settlement Boundary, and in no way adjacent or connected to it.
- The proposed site would represent backfill, and not conform to the generally linear form of the main part of the village.

Under the proposed criteria:

- The site is entirely Greenfield in nature.
- Access to the site would be via Magpie Lane – a very narrow *tertiary* road with few passing places. This lane is already subject to numerous traffic conflicts and driver conflicts. We do not consider that access for additional properties will be either safe or practical.
- Pedestrian access to the proposed site would be extremely hazardous – there being no pavements, and via a narrow road with few passing places.
- There will be some Visual Landscape Impact – particularly with respect to neighbouring properties, and traffic approaching from the West via Bray’s Lane and the B1077.
- The site is in no way Connected to the existing built-up area, lying a significant distance away.
- The site is not in proximity to a recognised settlement, and could not form part of a new settlement.
- The site does not align with any of the scenarios in the Development Scenarios consultation.
- In summary, we contend that this site should not be accepted for development.

LPR/C4S/DEV/064 – South of Bell Road

- Under current policy, the proposed site is adjacent to the Settlement Boundary.

Under the proposed criteria:

- The site is entirely Greenfield in nature.
- Access to the site would be via either Bell Road or Chapel Street. Bell Road is an extremely narrow *tertiary* road with no passing places. It is probably the narrowest road in the parish, has high banks in places, blind bends and is used by large agricultural vehicles. Vehicle-vehicle and vehicle-pedestrian conflicts are a regular occurrence on this narrow road.

Chapel Street is another narrow *tertiary* road with few passing places, having three blind bends and the same agricultural traffic as Bell Road. We do not consider that access for additional properties will be either safe or practical.

- Pedestrian access to the proposed site would be hazardous – extremely so from the Bell Road direction – there being no pavements in either Bell Road or Chapel Street. Conflict with large agricultural vehicles would pose a particular risk.
- There would be unavoidable Visual Landscape Impact – particularly with respect to neighbouring properties on both sides of the road, and from the rear aspect of a significant number of properties on Chapel Street, where it bends to the South East and South. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape.
- The site is adjacent to the existing Built-up Area, and adjacent to and connected to the existing Settlement Boundary.

- Although this site can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development.
- In summary, we contend that this site should not be accepted for development.

LPR/C4S/DEV/065 – Land at The Street

- Under current policy, the proposed site is adjacent to the Settlement Boundary.
- We have already commented that the proposed assessment criteria take no account of areas prone to **flooding**. This proposed site is one such area – subject to surface water flooding in periods of heavy rainfall. See the images below – showing surface water flooding from this site, and to the East down The Street:



Under the proposed criteria:

- The site is entirely Greenfield in nature.
- The site is at the junction of Rectory Road, Magpie Lane and The Street. Magpie Lane and Rectory Road are very narrow roads with very few passing places. The Street narrows at this point. Wherever egress from this site is located, visibility to the right – down Magpie Lane – is exceptionally poor, as the road bends away to the right and has significant hedges and trees. We do not consider that access for additional properties will be either safe or practical.
- Pedestrian access to the proposed site would be hazardous – due to narrow roads with no pavements. Access to local services on foot would be fraught with hazards.
- There would be unavoidable Visual Landscape Impact – particularly with respect to neighbouring properties, and from the rear aspect of properties on The Street. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape.
- The site is adjacent to the existing Built-up Area, and adjacent to and connected to the existing Settlement Boundary.
- Although this site can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development.
- In summary, we contend that this site should not be accepted for development.

LPR/C4S/DEV/365 – North of Chapel Street

- Firstly, we believe that this site location has been mis-named. Chapel Street finishes opposite 'Corner Cottage' – where Bell Road starts. Reference to the Electoral Register will confirm.

- Under current policy, the proposed site is neither connected to nor adjacent to the Settlement Boundary. See **3PL/2023/0702/F** for the Case Officer's reasons for refusal, *"The site fall outsides the defined settlement of Rocklands classified as a Village with a Boundary and is not immediately adjacent to the settlement boundary."*

Under the proposed criteria:

- The site is entirely Greenfield in nature.
- Access to the site would be via either Bell Road or Chapel Street. Bell Road is an extremely narrow *tertiary* road with no passing places. It is probably the narrowest road in the parish, has high banks in places, blind bends and is used by large agricultural vehicles. Vehicle-vehicle and vehicle-pedestrian conflicts are a regular occurrence on this narrow road.

Chapel Street is another narrow *tertiary* road with few passing places, having three blind bends and the same agricultural traffic as Bell Road. We do not consider that access for additional properties will be either safe or practical.

- Pedestrian access to the proposed site would be hazardous – extremely so from the Bell Road direction – there being no pavements in either Bell Road or Chapel Street. Conflict with large agricultural vehicles would pose a particular risk.
- There would be unavoidable Visual Landscape Impact – particularly with respect to neighbouring and nearby properties on both sides of the road. These properties would lose the current visual amenity of unrestricted views of the surrounding rural landscape.

See **3PL/2023/0702/F** for the Case Officer's reasons for refusal, *"The proposed development represent visual intrusion and erosion of the open countryside. The proposed design and appearance in terms of scale, height and massing of the dwelling, is out of character with the local context and street scene. It would result in unacceptable urbanisation of the area that would harm the character and appearance of the area including the open countryside. The proposed development is contrary to Policies COM01, GEN05, ENV05 & GEN02 of the Breckland Local Plan (adopted 2019), as well as having due regard to National Planning Policy Framework (2023)."*

The above related to a single property on this site – a number of properties could only have greater negative impact. Further, the North East corner of the proposed site would abut the Methodist Church graveyard – which is in regular use by the bereaved and their families. Adjacent dwellings would serve to disturb the peace and quiet, and the open countryside views valued by the users.

- The proposed site is neither connected to, nor adjacent to, either the Built-up Area or the Settlement Boundary.
- As stated in the Case Officer's comments above, the proposed site would be unlikely to be in keeping with the scale and size of the settlement at this point.
- Although this site can be perceived to align with the proposed development scenarios E and F in the consultation, we believe that the other factors above weigh significantly against development.
- In summary, we contend that this site should not be accepted for development.

It may be construed that Rocklands Parish Council are *against* development of any sort. This is far from true. A significant number of individual dwellings/conversions have been accepted, and some positively supported, by ourselves – where appropriate for our Parish.

We would appreciate that Breckland Council take serious note of our responses – which have been extensively discussed at public meetings and between Councillors.

Rocklands Parish Council
17 February, 2024