



Rocklands Parish Council

Looking After Our Community

Poplar Farm
39 Long Street
Great Ellingham
Norfolk
NR17 1LN
14 December 2025

Regulation 18 Consultation
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 Consultation – Regulation 18, Preferred Options
December, 2025**

Please find attached, Rocklands Parish Council's response to the above phase of the consultation – in its second iteration.

We would be very grateful for confirmation of receipt.

Yours faithfully,

pp 

(Clerk to Rocklands Parish Council)

Cllr Philip Leslie
Chairman, Rocklands Parish Council

Cc: Cllr Sarah Suggitt (District Councillor)
Simon Wood (Director of Planning and Building Control)
Gemma Manthorpe (Planning Policy Manager)
Andrew D'Arcy (Principal Planning Policy Officer)
George Freeman MP

Rocklands Parish Council

Consultation Response

Breckland Local Plan

Regulation 18 – Preferred Options – December, 2025

Background

A public meeting was held in Rocklands Village Hall on Saturday 29 November, 2025 – where a presentation was delivered by RPC to outline the revised Regulation 18 consultation, and residents had the opportunity to express their views. Email responses – both before and after the meeting – have also been received and taken into account.

General Comments

- We firstly expect that this response is read in conjunction with our response to the first iteration of this Regulation 18 consultation. We will limit this response to particular aspects arising from this iteration.
- As we requested in our last consultation response, we now welcome that there is a Glossary in Appendix 1, at p.549. However, some of the definitions can unfortunately remain somewhat ambiguous.
- We previously commented that the sheer size of the consultation document itself was such that it presented “..a formidable and largely unapproachable barrier to a typical Breckland resident wishing to understand it, never mind respond to it”. This second iteration is significantly larger.
- The downloadable .pdf version of the Draft Local Plan does not have an active .pdf index (clicking on an index item does not take you to the relevant page) please ensure that this is corrected in future documents. The lack of such a straightforward measure makes an already very large document more difficult to navigate.
- There are some errors and inconsistencies in this version of the document – some of which we have already discussed at a meeting with yourselves on 3 December, but we will point out in this response those that we have noticed thus far.

GEN 02: Parish Hierarchy and Spatial Development Strategy

- We appreciate the improved parish hierarchy structure, and that the Council have recognised that Rocklands should sit in the more appropriate *Secondary Parish* tier.

GEN 03: Built Form

- This policy states:
“The built-up area will exclude:
d) *Undeveloped land that is allocated for new development or that has extant planning permission for new development that is yet to commence. Where a new development is completed, this becomes the new built-up area where it accords with the criteria in this Policy.” (our underlining)*
- This looks like a recipe for expansion of the built-up area, without limit – as each completed development results in the built-up area growing and expanding ever outward. In discussion with your Planning Policy Manager, Gemma Manthorpe on 3 December, she thought that there was a cap on such expansion of ca. 5% of the allocations set out for each parish in policy HOU 02 (Distribution of Housing Development) – for the plan period i.e. 2024-2042. However, we can find no reference to such *caps* or *limits* anywhere in the document.

- If you do not intend to limit such expansion, we find this aspect of the policy wholly unacceptable and we object in the strongest possible terms. Rural villages could expand in a way, and to a size, where they cease to be villages and lose their distinctive character – contrary to policy Gen 03.

GEN 04: Development and the Built Form

- Section 1 states:

"In the Market Towns, Key Service Parishes, Primary Parishes, Secondary Parishes and Tertiary Parishes, as defined in this Plan, development will be permitted where it is within or immediately adjacent to the built form of a settlement." (our underlining)

This, together with the statement in GEN 03 above, means that the built form of the village would have the potential to constantly expand – as any development "...immediately adjacent..." would become the new boundary of the built form. The relationship between these two statements requires clarification.

HOU 02: Distribution of Housing Development

- We recognise that Rocklands' new position, as a *Secondary Parish*, in the hierarchy has resulted in a modest decrease in the Total allocation (2024-2042) down to 38 dwellings.
- An issue arose from a question by one of our residents at our recent public meeting on the latest Regulation 18 draft. If, before adoption of the New Local Plan, you received an application from a developer to develop one of the *Allocated* sites, what would happen? This was discussed with Gemma Manthorpe at our recent meeting.

I think we understood that such an application would be treated as a normal windfall application under the current Local Plan. However, we then discussed what would happen in respect of the parish allocations set-out in the Draft Local Plan (HOU 02: Distribution of Housing Development – p.68). Would one of the *Alternatives* be brought forward..? I don't think that we arrived at a conclusion?

As far as we can see, the following must apply:

- a) The assessment of development requirements has determined an allocation of 38 dwellings is required from Rocklands parish (HOU 02, p.68)
- b) This is for the period 2024-2042.
- c) The calculation of 'New Allocations' (25) takes into account that 13 dwellings are already 'Built / Committed'.
- d) Let's say that, in the interim – before the New Local Plan is adopted – one of the *Preferred* sites is granted permission for 6 dwellings.
- e) The calculation on p.68 then becomes:
19 'Built / Committed'
19 'New Allocations'
38 'Total (2024 to 2042)'

We can't see any other outcome?

- Indeed, when reviewing the YouTube video of the online consultation session on 8 December, Gemma Manthorpe discusses the effect of additional *Extant* planning permissions – and appears to confirm our conclusion above. Please confirm...

12. Site Specific Policies -Housing

- Whilst we recognise that the two allocated development sites now set for Rocklands have been put forward as *Preferred* allocations after the re-run of the Phase 2 Site Assessments, we still have the same concerns as outlined previously. We repeat them below.

PROPOSAL ROC 1: North of The Street (LPRC4SDEV065, p.472)

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.

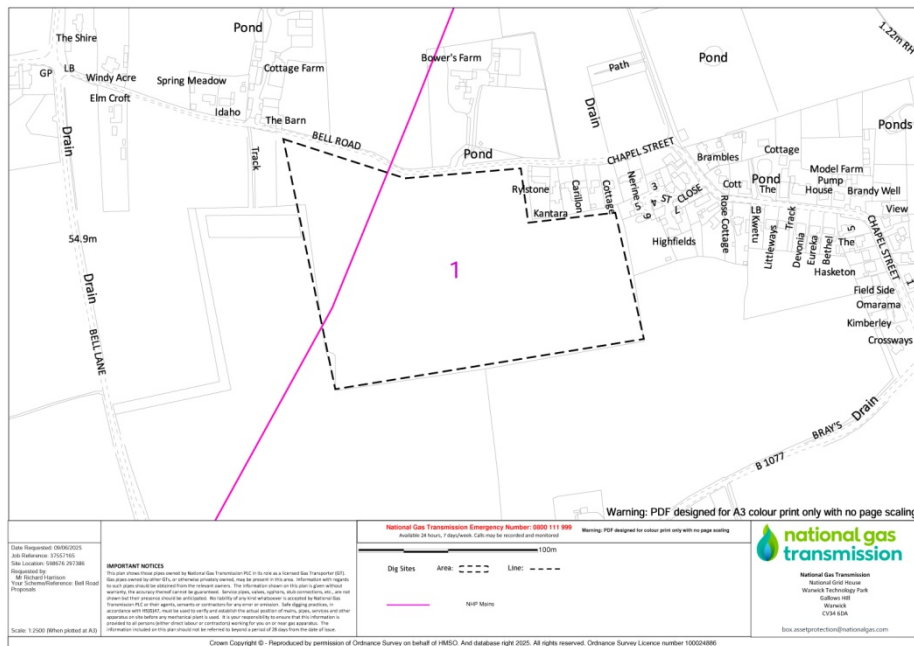
PROPOSAL ROC 2: South Of Bell Road (LPRC4SDEV064, p.475)

This site is adjacent to the Settlement Boundary.

Residents have asked – why use good quality agricultural land?

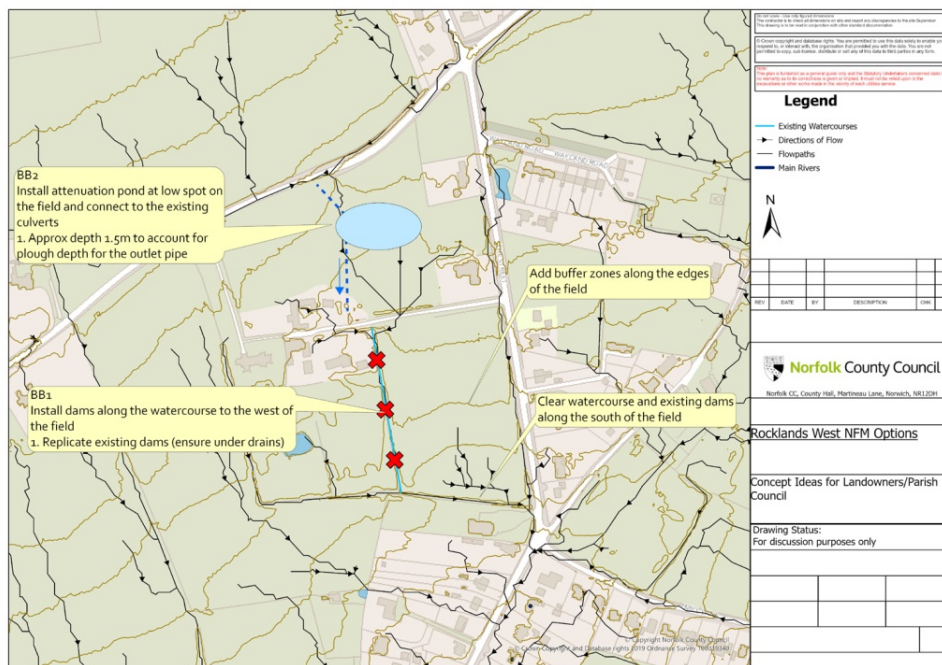
The appeal of this side of the village lies in its simplicity – a peaceful, close-knit place with a genuine rural character, a slower rhythm of life, a lack of noise or rush. Whilst recognising that the current proposal for this site is a significantly smaller (15) number of dwellings than previously (115), the increased number of motor vehicles using the narrow access roads from either direction would still threaten the character and peace of the area.

A report secured from National Gas Transmission (see map below) shows that a High Pressure Gas Pipeline (a Major Accident Hazard Pipeline) transits the proposed site – and will limit the extent of any development on this site:



In working with the LLFA on flood mitigation strategies, and on inspecting surface water flow paths maps derived from LIDAR mapping, it is clear that the proposed site – at higher elevation than the main village – attenuates substantial rainfall, which even then floods across Brays Lane to the South – then into The Street. Substantial hard surfacing – even SuDS/porous types will lead to an increase in surface water flooding in the village.

The area of Bell Road between the proposed development site and Bower's Farm - directly opposite – floods in times of significant rainfall.



This development would erode and urbanise the open, rural character of the site. It would result in harm to the character and appearance of the area. It would effectively become a significant housing development – in conflict with the otherwise linear development in the area – in what is otherwise a quiet rural setting.

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 (where there has recently been a serious accident), 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 current draft Local Plan p.33 – 4.11 ‘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.

Flooding

- We welcome recognition in policy HOU 02 (Distribution of Housing Development) that Rocklands has been identified, with certain other settlements, by the LLFA “..*as having particular concerns around flooding.*” – and that “*All new development in these areas will be required to demonstrate that pre application discussions have taken place with the LLFA and that appropriate mitigation measures are agreed and in place.*”

However, our settlement is referred to as “*Rocklands All Saints*”... Firstly, please note there is no ‘s’ when describing Rockland All Saints. More importantly, Rocklands, the village, incorporates two settlements – Rockland All Saints, and Rockland St Peter. Rocklands, the parish, additionally includes hamlets such as Mount Pleasant, Fen Street etc.

Further, as detailed previously and during our online meeting with your SFRA review consultants, the All Saints part of the village is not the only part that experiences surface water flooding issues. The area of Bell Road adjacent to Bower’s Farm floods in times of significant rainfall. Additionally, that area of Rockland St Peter North of Attleborough Road suffers from extremely high groundwater levels during the Autumn/Winter period. This usually leads to the failure of septic tank systems – with the discharge pipes becoming below groundwater levels. Also, in a number of cases, groundwater can rise above the surface of lawns and gardens – causing surface water flooding in these areas.

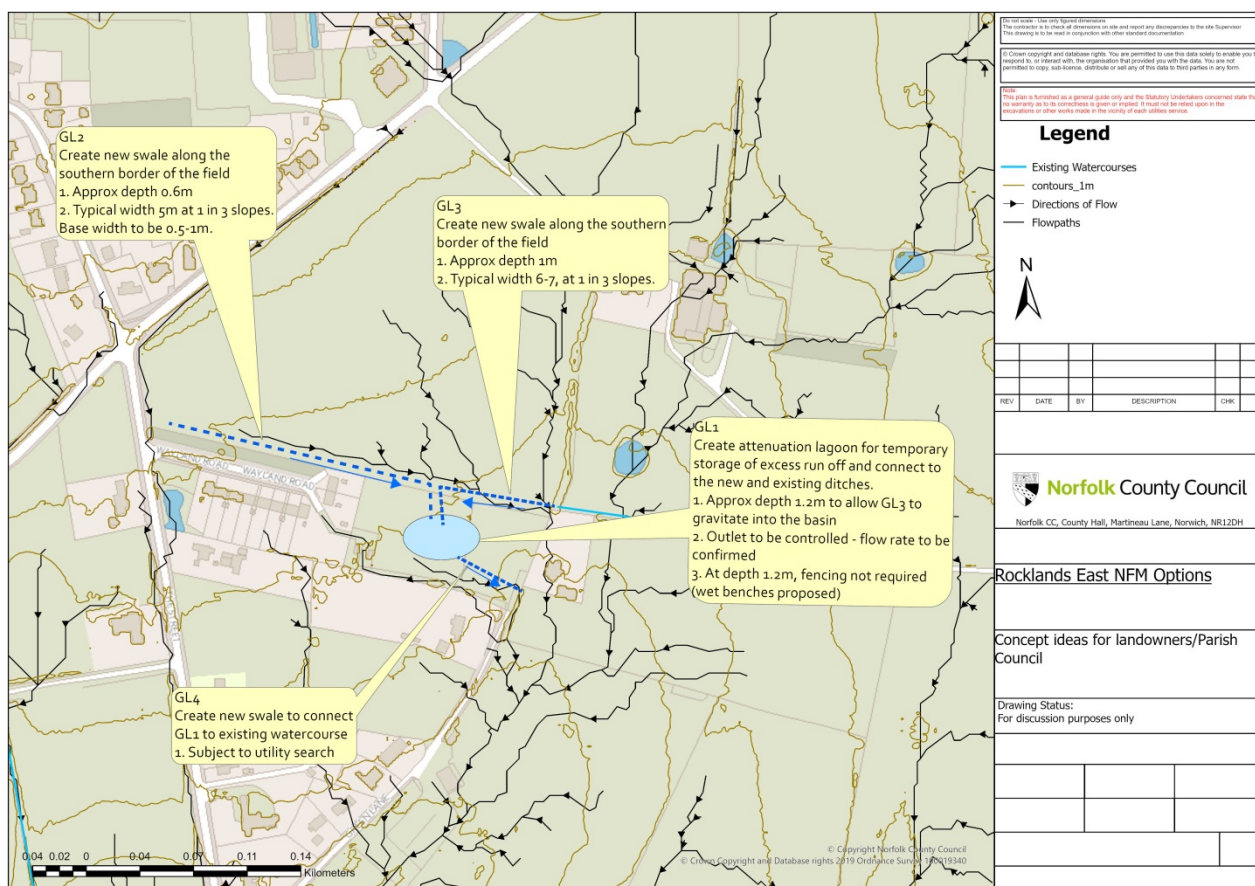
In view of the above, the aforementioned statement on p.73 (HOU 02) should use the settlement description ‘Rocklands’ only.

- In spite of recognition of the above in policy HOU 02, the current Level 1 Strategic Flood Risk Assessment (September 2024) merely makes very fleeting reference to “*Surface water/drainage system blockage/failure*” and “..*some fluvial flooding.*”. This, in spite of substantial empirical evidence supplied to your consultants before and during their consultation with stakeholders. At our recent meeting, your Planning Policy Manager, Gemma Manthorpe, mentioned a Level 2 SFRA – which may address this apparent conflict..?
- Certainly, key to effectively addressing the flooding issues when assessing planning applications in Rocklands, is how an assigned Case Officer will be alerted to the evidence required that “*All new development in these areas will be required to demonstrate that pre application discussions have taken place with the LLFA and that appropriate mitigation measures are agreed and in place.*”. Indeed, what will be the procedures to ensure that this happens? Which planning system document(s) will be

referred-to – and how will the apparent conflict between the current SFRA Level 1 and policy HOU 02 be resolved?

ENV 13: Local Green Space

- Rocklands has earlier submitted a site as part of the Local Plan consultation process:
“005: Land to rear Wayland Road, Rockland All Saints”
- and this has been considered as a potential location for designation, as outlined in the Local Green Space policy.
- Subsequent work with the Lead Local Flood Authority (LLFA) has identified this land as part of the most effective Natural Flood Mitigation opportunity for Rockland All Saints – accommodating an attenuation lagoon. See below for an LLFA map of the area – derived from LIDAR surveys.
- At a depth of just 1.2 m, the LLFA advise that fencing will not be required. We therefore envisage using the green space as not just part of the Rocklands NFM, but also as a valuable wildlife area for the enjoyment of our school children and adults alike.
- The land has been in the ownership of Breckland Council for decades, and remains unused. We have discussed its importance with our District Councillor, Sarah Suggitt, and urge that is designated for its protection.



Neighbourhood Plans and Built Form

- The current Draft Local Plan seeks to eliminate the concept of Settlement Boundaries, and adopt a “..criteria-based approach that it considers has the potential to protect the character of settlements and the countryside whilst enabling sustainable development.” Whilst policy GEN 03: Built Form, does not refer to it, para. 4.33 of the Draft Local Plan states “Neighbourhood Plan updates could, if desired, implement local Settlement Boundaries informed by the strategy and criteria for growth established in the Local Plan.”

- In respect of the above, and the current situation created by those aspects of policies GEN 03 and GEN 04 which we have already commented on, it is difficult to understand how such “*..local Settlement Boundaries..*” could work when there appears to be the potential for unlimited expansion of Built-up Areas/Built Form. Clarification would be appreciated.

Settlement Boundaries

- Rocklands Parish Council maintains yet again that eliminating Settlement Boundaries indiscriminately is wholly inappropriate.
- Settlement Boundaries in rural locations are a powerful defence against inappropriate development.
- Breckland Council 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.
- 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.

Other

- Breckland officers have explained that they need to consider housing and development requirements for the long-term future – beyond the Local Plan period – and Rocklands Parish Council understands that. However, some officers appear to be of the belief that incremental expansion of all settlements – irrespective of their ability to accommodate progressive expansion – should be the expectation.

Rocklands Parish Council strongly disagrees with this expectation. In many cases, small rural settlements will lose their character and close community atmosphere, and no longer be recognisable as villages.

The current Draft Local Plan explains (p.15, para.1.19) “*The existing character and attractiveness of Breckland’s towns and villages is highly valued..*” Breckland’s Strategic Vision (p.26) states “*Breckland’s towns and villages will have retained the features that provide their character.*” Such aspirations are repeated in many other parts of the current Draft Local Plan.

Incremental expansion of settlements, irrespective of their ability to accommodate it, serves to contradict the aspirations exemplified above.

Rocklands Parish Council

14 December, 2025