

Regulation 18 Consultation Draft: Village Clusters Housing Allocation Plan, South Norfolk Rockland St Mary Sites SN2007 and SN0531

Reasons for Objection

Under the National Planning Policy Framework (NPPF) this site does not meet the three specific criteria for sustainable development as follows;

- *Economic – there would be no local employment provided or supportable in the local area.*
- *Social – new houses would be provided but the volume is excessive and unnecessary for the need in this location being at least equal to the current allocation of houses for Loddon.*
- *Environmental – there would be major negative environmental impacts including traffic movements, light and noise pollution to sensitive landscape.*

Valuable Heritage Assets

The three Grade II listed buildings that are adjacent to this site, namely Rockland Old Hall (a 17th century manor once owned by the owner of nearby Ashby Hall and subsequently a working farmhouse) a hayloft and two barns, are integral to the agricultural and open character of the land being considered for development. These buildings constitute valuable heritage assets and their value as such is enhanced by both the fact that they form a complete group of early 19th century farm buildings and that they were extremely likely to have been built using Rockland bricks. Brickmaking was a key industry in Rockland in the 19th century, the area being rich in clay, and the historic significance of the construction of the Old Hall farmstead in this regard should not be understated. Given the presence of a significant number of cattle sheds there is also a strong possibility that the farmstead is a surviving example of the Victorian practice of “high farming” and “model farms” which increases their historic significance even further (Dr Susanna Wade Martins, UEA, has written extensively on this subject with particular reference to the historic agricultural buildings of South Norfolk).

As set out in the National Planning Policy Framework (NPPF), the “significance” of a heritage asset is derived “not only from its physical presence but from its setting”. Moreover, the value of a heritage asset is affected both by “views of or from an asset” and the ability to “understand the relationship between the asset and its surroundings”. The heritage significance of this farmstead lies in both its architectural and historic interest, typical of the region and periods, and its setting, having a historical functional relationship with the adjacent land. Therefore residential development on this land would be catastrophic to the agricultural setting to the south and east, the listed buildings not only positively contributing to the visual attributes of setting but being intrinsic to an understanding of the historic significance, both locally

and nationally, of these listed buildings. South Norfolk council's assessment of the "historic environment impacts" has not considered the contribution that the agricultural settings makes to the importance of these listed buildings and there is no evidence this has been taken into account in the planning process. Furthermore, St Andrews Church in Claxton is a Grade I listed building to the south and the site would also affect the context and setting of this building. The guidance in the NPPF advocates a positive plan for conservation of the historic environment, as laid out in paragraph 185, which states "plans should set out a positive strategy for conservation and enjoyment of the historic environment including historic assets". **For these reasons, the development of site SN2007 and SN0531 would not meet the objectives of the positive plan making as per the NPPF.**

This has been tested numerous times in court, an example of which was *Catesby Estates Ltd v Steer and Secretary of State for Communities and Local Government v Steer*, in 2018 where Historic England successfully intervened in both appeals, although examples of other cases can be provided on request.

To conclude, the proposed development of SN2007 and SN0531 would cause significant harm to the understanding of the historic significance and setting of these buildings, and there is inadequate evidence that the council has given them "considerable weight or importance" in their decision making.

Rural Setting

The South Norfolk Place Making Guide requires that the rural quality of the area is maintained and that consideration be given to the impact of development on skylines in open areas. The proposed development would not provide for this.

The scale and impact of the site is out of context with the historic linear growth, size and design of the existing village. Development at this height would negatively impact the wider rural landscape including views to and from two river valleys, sensitive internationally important environmental/ecological areas and the setting of the listed buildings discussed above. It would also create further pressure for subsequent "infill" development around the proposed site in the future. The views from the site, which is 18 metres above sea level, extend towards the Yare Valley, RSPB reserves, conservation areas and fields. If this site were developed, these views would be obstructed.

The proposed site is interspersed by permitted footpaths and is abundant in a wide range of flora and fauna; this biodiversity would be adversely affected. The South Norfolk Place-Making Guide defines the area as "Rockland Tributary Farmland" with a presumption against large development. Characteristics are "small nucleated settlements inland including Rockland St Mary" and "Important views towards.... The Broads which provide a sense of place".

It would be appropriate for this site allocation to be considered by The Broads Authority as parts of Lower Road and some of the dwellings are within The Broads Authority Boundary.

Access

The A146 Norwich/Beccles road is the only main road around Norwich NOT classified as a “growth corridor. The Kirby Road to Rockland St Mary is inadequate to cope with the additional level of traffic. Particularly unsuitable sections of carriageway exist in Bramerton, entering Rockland St Mary as well as south through Claxton. Poor road features include narrow carriageway width without central line marking, right angle blind bends, hills and tyre worn verges.

Any development would create additional traffic movement through the whole of the village where there is already much on street parking causing congestion, potential hazards and disruption. It would also impact other much smaller rural settlements such as Claxton, Carlton-St-Peter and Ashby St Mary where roads are inadequate e.g.; Church Lane, Claxton which is the closest road to the proposed site, a narrow single lane road with high hedges and blind corners.

There is no local employment in Rockland St Mary for this scale of development. It would require most jobs to be in Norwich and require all occupiers to commute through the length of the village (c 1 mile) by car adding little or nothing to the community or the sustainability of the development. Alternative journeys through Claxton and other local villages would be on unsuitable roads.

Lower Road is on the Sustrans National Cycle Network Route 1 and is “a series of quiet, on road-cycling and walking routes”. There are only footpaths on one side of the road at this point in the village where a site entrance is proposed and these would be inadequate for highway safety of pedestrians.

No existing formal road access currently exists into the proposed site. Any access points would encourage additional development, provide poor visibility and would lead to excessive traffic on green belt land encouraging additional vehicular movements on The Broads Boundary. The vehicle access point is toward Claxton breaking up the rural landscape adjacent to The Broads. It is proposed that an established oak tree would be felled and any new tree planting to the access would create a false feature out of keeping with the rest of the setting.

Services and Utilities

The village school would suffer additional congestion being situated within a small cul-de-sac.

Any potential development would require significant utility investment. Those such as water and electricity have suffered regular disruption. All utilities are a significant distance away from the proposed site with insufficient capacity for a proposed development of this scale. Indeed, the UK Power Network has stated that there is no spare capacity for electrical supplies. To rectify the power, water and drainage issues to accommodate such an increase in housing would require huge investment and result in significant further disruption.

It is not clear how suitable foul and surface water drainage could be achieved to mains sewers.

Flooding Risk

This area is a natural source of water drainage into Rockland and Claxton marshes, Rockland Broad and The Beck hence development could lead to pollution of the natural water system impacting water quality. DEFRA have previously issued guidelines in this area as a Nitrate Vulnerable Zone (NVZ) to bring about improvements in water quality which may be threatened by any development.

There are existing houses in this locality that have their water supply from boreholes not Anglian Water mains. There would be a risk of contamination (as has recently occurred at Coldham Hall Surlingham) or diversion of natural water away from these private supplies.

The Environment Agency (EA) classifies the Norwich and Broads Water Resource Zone (WRZ) as an area of “serious water stress”. The EA Flood Map for Planning shows the areas to the east and south (including Lower Road and The Beck) are designated Flood Zone 3 which are areas at most serious risk of flooding in the UK.

The land (and the site access) falls to c 0-5 metres above sea level at Lower Road to the east. A large development and diversion of surface water provides potential for “knock on effect” flooding of Lower Road and areas such as Rockland and Claxton marshes which are also areas in Flood Zone 3. The River Yare is higher than the adjacent marsh and farmland. A single pumping station on the River Yare at Claxton irrigates farmland and marshes. In autumn 2017 the pump failed requiring emergency repairs. Significant risks occur after snowfalls. Anglian Water, EA, The Broads Authority and landowners need to be consulted on this risk.

Scale

Bee-Orchid Way has already provided additional housing stock in the village. This site was adjacent to existing residential areas with infrastructure and all utilities existing; it is also at lower level than surrounding areas, on a sloping gradient and with less impact on the landscape.

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Summary

At every level the proposed site is unsuitable for allocation of a new housing development of any size. It has many potential adverse impacts, risks and uncertainties as follows;

1. Against planning policy – sited outside the village development boundary, contrary to the South Norfolk Local Plan Development Management Policies and national planning policy.
2. Situated in a rural area and isolated from the existing village.
3. The site height of 15 metres is the highest on the eastern side of the village having a detrimental impact on the skyline, rural landscape and views of SSSI/AONB.
4. No need for a development of this scale, out of context with the form and character and with existing planning permissions in the village.
5. Risks of pollution to local water courses and adjacent flooding risks from diversion of surface water.
6. Severely limited existing highway infrastructure, access, footpath and National Cycle Network issues.
7. Inadequate services and existing utilities location, capacity and cost of upgrade.
8. There are alternative brownfield and infill sites in the local area.
9. It is not sustainable development - no economic, social or environmental benefits.
10. The impact on views of listed buildings, archaeology, ecology and biodiversity of the area.
11. Loss of local amenity and public footpaths
12. Lacking local support.
13. Site would have the unintended consequence of leading to additional adjacent development
14. This site goes against the precedent of previous planning decisions.