

From:
To: [Local Plan](#)
Subject: Broads Authority comments on the South Norfolk Village Clusters Local Plan
Date: 16 July 2021 12:51:42

Hello

Please find the comments from the Broads Authority on the South Norfolk Village Clusters Local Plan below.

Thanks

Natalie

SNVC Objective 3 - Protect the character of villages and their settings

- As written, no objectives refer to the protection of the environment. At the very least, number 3 should be expanded to include not just protecting the setting of the village, but setting of other assets in the area like heritage and protected landscapes.

Policy SNVC2 – Design

- ‘However, **the** many of these Preferred sites’
- Not just the SNDC landscape character assessment, but please consider ours: [Landscape Character Assessment \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

Assessment of sites

- Why has the Norfolk HELAA been amended? The whole point was to ensure a sustainable pattern of development across Norfolk. You may want to thoroughly explain why such changes to the Norfolk-wide approach have been made.
- What extra distances have you used?
- Also, when you say ‘safe and convenient access to those services’, what mode of travel is that by? How has the quality of the route and likelihood of someone using the route in all weather, at all times of the year been assessed?

Gillingham, Geldeston, and Stockton

- ‘with a further cluster of development at west Kings Dam’ – do you mean along Kings Dam to the west? As written, it does not seem to read well.
- It is not clear if a settlement limit alteration is made for Gillingham. There is a question asking for views, but the text is not clear and a dashed red line is not obvious on the map. It does not say ‘no alteration to the settlement limit is made’ like in other places.

Langley with Hardley

- ‘Development within the parish has been concentrated into **tree** small groups at Langley Green’ – think this should say ‘three’

Kirby Cane and Ellingham

- Ellingham is near to the Broads – you might want to mention that. See next comments in particular.
- Site: SN0305, Land South of Mill Road, Ellingham
The site would extend the edge of the settlement towards the BA area to approximately 400m from BA boundary. Visual receptors: Footpath leading from centre of village in a south-westerly direction connects to Lane almost on BA boundary. Site may be visible to users of this path. In addition this National Cycle Route 1(NCR1) follows Geldeston Road to the south and Church Road west of the site - 200m at closest point. Due to a lack of screening vegetation the site is clearly visible from the road. There is some intervening vegetation between the site and the BA area but fields to south have little or no vegetation along boundaries. The immediate area is quite flat and open. The site is unlikely to be visible from River Waveney although it should be borne in mind that water based recreation is popular in this character area, due to the existence of Waveney canoe access agreements which permit canoeing upstream of Ellingham Sluice to Diss. The valley here is fairly narrow and the southern side rises relatively high so there may be distant views of the site from the Shipmeadow/Mettingham area.

When writing the policy, please add:

- development of the site needs to include adequate screening
- reference to the proximity and sensitivity of the Broads and NCR1 in the allocation policy.
- Site: SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane
The site is more distant from the BA area with the settlement of Kirby Cane largely intervening. It is at the foot of the northern valley slope (around 5m) and at the north-western end of a small tributary valley which extends down to Geldeston. However, from Geldeston it does not seem possible to view the site. The side valley has a patchwork of small fields with trees along field boundaries which provide screening. There are also blocks of woodland. In potential views from the Broads which are probably very limited and distant, the site has an advantage of a backdrop of the northern valley side which is wooded in this location. There don't appear to be any sensitive visual receptors in the vicinity. The valley sides, the ridgelines of which lie in the main beyond the Broads area, form prominent skylines to this character area and are relatively undeveloped. However neither of these 2 sites would impact ridge or skylines.

When writing the policy, please add the following (or similar) from the BA landscape character assessment:

- New large scale development within the valley floor or on the valley side needs careful assessment of the potential effects on the local landscape character and adverse landscape effects mitigated.
- Care needs to be taken in relation to development proposals within these areas which form the landscape setting to the Broads. It would help if such requirements were set out in the allocation policy.

Rockland St Mary

- Site: SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary

The site extends beyond the eastern extent of the main village and is fairly prominent being on a ridge, and is only approx. 150m from BA boundary. Also close by are RSPB Rockland Marshes, Rockland Staithe and visitor car park. Wherrymans Way runs close to the site (closest point 10- 20m). National Cycle Route 1 follows New Inn Hill Rd and Green lane close to the site, and a footpath runs through the field to the east. There is a possibility the development could break the skyline in views from the Broads area - the skylines in views out of the area are remarkably free of development of any form adding to the sense of isolation. Much of the land within this area is subject to many nature conservation designations covering most of the area.

Comments on this site:

- Taking these factors together suggests that this site has some potential to adversely affect the local landscape character and the setting of the Broads. Therefore we ask that the allocation policy includes a requirement for Landscape & Visual Impact Assessment and that the Broads Authority are consulted on the selection of viewpoints.
- SN2007 says 'Whilst the site extends beyond the eastern extent of the main village and is fairly prominent as it is on a ridge, the precedent for development has been established by the adjoining Eel Catcher Close development'. I don't think that conclusion can be reached. You could say that about any settlement fringe site – that because there is development there already, and a site may be adding onto that, development is ok. The proposed site is further east and further south than the existing development.
- The policy is called SN2007, but the text refers to SN0531 and the map shows the sites joined. This could do with being a bit clearer. Either call the policy both site numbers or delineate the two sites and say that they will be considered as one.
- Says 'appears to offer the potential for an additional footway access back to the main village' – so will it or won't it? Will that requirement be part of the policy wording?

Thurlton

- 'Beccles Road provides a relatively a good link to Beccles and the A143 to the south' – two 'a' in the sentence.

Wheatacre & Burgh St Peter

- Part of the parish is the Broads – you might want to mention that.

Throughout

- Throughout, in the form and character sections, you talk about having links to various other places /being well served. Is this a road link, pedestrian link, public

transport? It might be an idea to say what mode the link relates to. The commentary seems all about the car at the moment.

- Do you need to summarise access to the various services in the main document?
- Did you want to say where the bus goes to and if there is a peak hour trip?

Maps

- The legend says that blue is rejected sites and sites being assessed in Neighbourhood Plans (NP). Are all blue sites doing both things? Could a site just be rejected and not be assessed in a NP? If a site is being rejected by the Local Plan, how can it then be successfully included in a NP?
- Should you plot on the maps where the services are?

The Planning Department are mostly working from home. We will still be responding to emails at this time. We encourage you to use email for correspondence at this time as this will enable your enquiry to be dealt with more quickly.



broads-authority.gov.uk

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