

South Norfolk Village Clusters Housing Allocations Plan (Reg.19 Pre– submission Draft)

Site Reference SN2064REV-Land South of the Street Rockland St Mary (rear of surgery)

Representation made by Mr and Mrs A Rayner of 22, The Street, Rockland St Mary.

We have recently moved to Rockland St. Mary, having noted the ongoing Greater Norwich Local Plan which has been delayed by the Covid pandemic, and has now reached the Regulation 19 pre submission draught after the Regulation 18 consultation. We have noted that one of the sites under consideration directly abuts our property. In order for this site to be implemented, having read the consultation responses and in particular from Norfolk County Council, as highway authority, we have sought professional planning and highway advice on how this site can be developed with the promoter not showing within the submission, land within his control, and clearly involving land owned by our neighbours and possibly ourselves.

Questions to be considered in this submission include whether the Plan is legally compliant. The site under consideration under reference SN2064 Rev has changed in that its form of access differs from the original site for which the general public were consulted upon. My wife and I and our neighbours, who would be affected by the development, have affectively had no chance to comment on the revised proposals. This is a lack of “community involvement” .

In the circumstances we should like to make the following observations and comments. Any site included in the Local Plan should be deliverable within the Plan period. For the following reasons we consider it undeliverable in the foreseeable future.

1. The original access beside the surgery was withdrawn presumably because the promoter of the site was unable to secure land to enable access, from the Third Party owners of necessary land
2. An alternative access using an existing agricultural field access, which is in the control of the promoter, is now proposed. This access, in its current form is substandard for a number of reasons and clearly was not considered appropriate when access via the surgery land was preferred by the Developer/Promoter on behalf of the Proposer who states in their original submission on March 15th 2018 “we believe that the land would be better accessed by way of an existing access way located between the heath centre and No 36 The Street”.
3. Whilst the existing agricultural access exists, it is little used and it's limited width is insufficient to provide a minimum width of suitable access to residential development of up to 25 dwellings. The width over most of the length of the track is 18 ft (5.48 metres). This is shown in documents we have from the original sale of the land . This level of development would need to be served by a minimum Norfolk County Council Type 6 Access Rd with an overall carriageway width of 5.8 metres with margins for kerbing and public utility strips. This would require a total width of approximately 7.8 metres. Aside from the width of the Farm Track, the existing agricultural access is constrained by third party owned buildings (within the third party land on either side) with a width of less than 6.5 metres between them, highlighting the need to secure land from the owners on both sides of the track.
4. It is essential at any access to the site linking to The Street should have visibility splays appropriate to the prevailing traffic speeds. The site access would be located in a 30MPH section of The Street and if traffic speeds were low, the absolute minimum visibility splays for an access to serve 25 dwellings would have lengths of 42 metres in either direction at a setback of 2.4 metres. This is in accordance with the minimum standards recommended in the ‘Manual for Streets’. If measured traffic speeds were greater than 30 mph in the area longer

splays would be required. The curvature of The Street to the West of the proposed access means that a considerable area of visibility splay would be across land owned by my wife and I and our neighbours. I would not wish to sell this land because we value the amenity view from our back garden which would be obliterated if the site were developed for residential use.

5. The visibility splay required in an easterly direction together with the provision of a footway linking to the existing footway to the east, would require reduction in the size of the existing pond and the construction of an appropriate retaining structure at the rear of the footway. This proposed land including that adjacent to the existing pond (that will have it's own ecology consideration) has vegetation blocking visibility. To secure this provision it is likely that land would need to be acquired from other landowners. From discussions with our neighbours, it appears this is unlikely to be forthcoming.
6. Parking in the Street has a high prevalence of parking on the road. The proximity of a very busy time share swimming pool and the proximity of the post office and shop results in vehicles parking on the north side of the road. This leads to passing vehicles travelling on the south / right hand lane whilst travelling east. This would impede any vehicles looking to enter the main carriageway from the proposed access route, especially those turning left toward Norwich – which would be the majority of residents of the development. **Photographs are attached.** PLEASE Note the proposed access track is on the Right Hand side of the photographs just past the small bush. You can see parked cars on the left hand side with overtaking cars on the wrong side of the road, immediately opposite the proposed access track.

It is concerning to us that the '*UPDATED CONCLUSION POST-REGULATION 18 CONSULTATION*: (January 2023)' states, inter alia,

"Ongoing discussions with the promoter of the site have confirmed that they have continued to seek a resolution to achieving a suitable access and visibility splays to this site. **The Highways Authority has advised that it is likely that any solution will require the addition of third-party land.** The site continues to be considered as a preferred option for development in the settlement, for up to 25 dwellings, **subject to an appropriate access into the site, with adequate visibility, being achieved.**"

The first access point (through surgery grounds) was proposed by the developer, but fell through because required Third Party Land was not available. The second (most recent) proposed access point, offered by FW Properties **as a solution** is between numbers 24 and 26 The Street which also requires third party land to achieve safe visibility splays to the access and pathways . This land is not available. The developer knows this , and was informed when they asked the owners of the land if they were prepared to sell. The answer was no. The land is not for sale.

A note on the Duty to Cooperate. Reliance on the Developer seeking "improvements" to bring the access up to appropriate "Highway Authority's Standards" does not suggest engagement with the Highway Authority "constructively, actively and on an ongoing basis" . No such land is available, and active engagement would have made this clear much earlier .

The proposed access route is unsound . We believe the site promoter knows this, which is why this was not the first proposed access route in the initial call for sites. The Farm Track is the most obvious in terms of ownership as it is in the control of the developer, but was not initially preferred or proposed. Respectfully, The Inspector should cease providing the site promotor with opportunity to propose ever more inappropriate access points and draw a line under the matter. **As land is not**

available for appropriate access and given fundamental time scales of the Plan, other sites which are capable to be developed within the Plan period should be considered in place of this site.

It is therefore our submission that the site should be removed in its entirety from the options for development in the settlement of Rockland St. Mary.

Mr & Mrs A Rayner.