**South Norfolk Village Cluster Housing Allocation Plan (VCHAP)**

**Rockland St Mary with Hellington (VCROC2)**

***Context***

*The South Norfolk Local Plan and the broader Greater Norwich Local Plan (and Joint Core Strategy between South Norfolk, Broadland and Norwich Councils) have all been adopted by Council.*

**Character and Form**

South Norfolk Village Cluster have three objectives: first, to respond to housing need; second, to support the delivery and sustainability of services attendant with this. SNVC Objective Three states that such development must **“protect the character of the villages and their settings”.**

Objective One is in direct contradiction to Objective Three regarding these two development proposals; the developments will be to the detriment of the visual landscape in the village and its surrounds.

**Small scale, local**

The strategy and evolving Plans have been designed in line with the guiding National Planning Policy Framework (NPPF) set by central government in relation to rural housing. **The NPPF, paragraph 69** specifies the desirability for smaller scale rural housing development to recognise the **“importance of small and medium sized sites up to 1 hectare in size”.**

The updated site assessment for Regulation 19 thus goes against the spirit and letter of the NPPF as VCROC2 site proposal exceed 1 hectare, with 1.22ha. 25 sites per development is proposed, yet the HELAA/site assessment indicates sites as possible for *less* housing units.

**Suitable, achievable, available**

NFFP also states preference for developments which are:

“shown to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site with five years” (or that developments will start to come on stream within five years).

This is in line with **NPPF Paragraph 74** relating to supply of sites. The test for allocating sites is that they are:

* + - Suitable
		- Available
		- Achievable

 (Source: Greater Norwich Housing Supply Assessment, 1st April 2021)

Site presents significant landscape and highways problems for the developers which go beyond the physical sites onto third party land. NCC Highways have stipulated a number of recommended and required measures on vehicular access and visibility, pedestrian pathways and the need for new pathways. ROC2 vehicular access proposed is a tractor track between two houses, the width of which does not meet Type 6 Highway compliance & badly situated for suitable visibility splays and cannot be delivered without the demolition of one of the houses. Equally ROC2 access to village for pedestrians and for disabled mobility and wheelchair users requires a new level path which crosses third party resident land, including a valuable natural pond owned by them. The logistics and challenges suggest that this site is not suitable, available or achievable.

**Low Carbon Futures**

Paragraph 192 of the NPPF states that:

**“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”**

The site assessments revised for regulation 19 process do not show any attention to these matters. It is not clear how the village can cope with increased flows of resident traffic and create healthy, low carbon rural living, given the layout of the settlement with a linear single road providing, deliveries, visitors, access to housing units, thoroughfare for agricultural traffic, alternative route for diverted A road traffic, national cycle route, potential tourism opportunities, school runs, private school transport routes and other through traffic.

VCROC2 has significant issues regarding legality and soundness for these specific sites. These can be inserted and tweaked for each of the two sites under proposal:

i L**andscape and visual experience for residents and visitors.** Rural landscapes are undermined. Site assessment focuses unduly on landscape from ‘The Street’ but not from other vantage points in the village, fields and valley.

ii **Natural habitat continuity and wildlife is under threat**: HEFAA/Site assessment raised amber concerns. As a gateway to The Broads National Park, National Cycle Route, Norfolk Trails and nature reserves (Wheatfen and Rockland Nature Reserve deer, bats, Skylark, hedgehog runs, birds of prey); unique mix of natural assets for the visitor and rural life and closeness to nature for residents.

iii **Highways compliance**: HELAA/site assessments raised amber concerns in Reg 18 not adequately dealt with in Reg 19. Access for VCROC2 is unworkable and recommended Type 6 for compliance not achievable; also relies on third party land to provide new, safe pathways.

iv. **Inclusivity and safety**: disabled mobility and wheelchair access seems unachievable; VCROC1 encourages more car use into village. VCROC2 vehicular access is not safe and results in bottle neck for residents in high traffic area. The vehicular access point creates new dangers and the increase of pedestrians on existing inadequate safe footpaths increases chances of accidents at dangerous bends and necessary crossing points for school, post office, bus stops.

v. **Climate change:** The development depart from stated NPPF in regard to working towards and transitioning to a low carbon future. Village cluster developments should ensure walkability and accessibility for all.

vi. **Utilities** - the sites are outside of the settlement limit which is at capacity in terms of drainage and sewerage. The site assessment for Reg 19 has not shown evidence of engagement with key stakeholders, Anglian Water. The village is already susceptible to severe water run-off and with increasing climate uncertainty more heavy rainfall coupled with additional sewage demands poses potential health hazards and increased flooding in the village.

vii **Affordability,** housing need – promoters have not given any evidence or information about the percentage of affordable or social housing planned for these two developments. Locals want affordable housing for their children, relatives, etc. The district councillor has indicated that housing will be affordable for rent of buying, that locals will have priority; these claims are nowhere evidenced or referred to in the current plan.