

OBJECTION TO POLICY SN2064REV / VC ROC2 : SOUTH THE STREET

- Please indicate if you support or object :

OBJECT

- Do you consider the plan to be legally compliant

NO

- Do you consider the plan to be sound

NO

- Does it comply with the duty to co-operate

NO

Your representation :

We wish to object to the allocation of SN2064REV / VC ROC2 Land south of The Street, Rockland St Mary (rear of surgery).

The objections to the proposed allocations are supported by the National Planning Policy Framework 2021 (NPPF) and South Norfolk Local Plan's Development Management Policies 2015 (DMP). The DMP's continued relevance despite the imminent adoption of the Greater Norwich Local Plan is confirmed by Policy SNVC2 of the Village Cluster Plan which states the DMP will continue to serve as design guidance for development alongside the South Norfolk Landscape Character Assessments (Landscape Assessments) and the South Norfolk Place-Making Guide SPD (2012).

The objection is premised on the proposed allocation's impact on the landscape and character, amenity, and the threat posed to environmentally sensitive sites.

Overarching policy issues relating to SN2064REV / VC ROC2

Section 2 of the NPPF 'Achieving Sustainable Development' defines sustainable development and sets out an overarching set of objectives and reiterates the commitment to a genuinely plan led system with local plans being informed by the NPPF. The NPPF provides that the goal of achieving sustainable development entails balancing the mutually supportive objectives of sustainable development – the economic, social, and environment objectives.

What is clear from the NPPF is that there is a commitment, at a national level, to ensuring that development is supported and is delivered to meet the demand for housing and employment. However, it is equally clear that this is to be balanced against the need to preserve the natural and built environment with this extending to the social and cultural wellbeing of the communities that are to host growth.

Section 5 of the NPPF 'Delivering a sufficient supply of homes', provides that the supply of large numbers of new homes, such as is envisioned under the GNLP with a total potential housing figure under the plan of 49,492, as being most suitably delivered '*through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and*

facilities (including a genuine choice of transport modes).’ This requires development to have *‘sufficient access to services and employment opportunities’*.

GNLP incorporates this approach within its goals stating that it intends to *‘concentrate the building of new homes in and around Norwich and in the Cambridge Norwich Tech Corridor’*. Rockland St Mary is a modestly sized village to the southeast of Norwich, remote from the tech corridor, with limited services and infrastructure provision and is not well suited to significant expansion.

Policy 1 of the GNLP categorises the plan area into a settlement hierarchy with settlements not expressly identified as falling within the Norwich urban area, main towns, or key service centres fallen within the Village Clusters, this includes Rockland St Mary. Development is to be delivered in accordance with this settlement hierarchy and provides 4,220 new dwellings, 9% of the identified demand for new housing, is to be delivered within the Village Clusters.

Allocation within the Village Cluster Allocation Plan (VCHAP) being informed by Policy SNVC1 and Policy 7.4 of the GNLP. SNVC providing that site allocations are to be for between 12 and 35 dwellings.

Section 11 of the NPPF, *‘Making effective use of land’*, provides at paragraph 119 that meeting the need for homes and other uses should be achieved *‘in a way that makes us much use as possible of previously-developed or ‘brownfield’ land’*, the GNLP provides that 22% of new development should be on brownfield sites. This is expanded in paragraph 120 of the NPPF which emphasises the multifaceted importance of undeveloped land particularly in rural locations where such land often has an important role for both the landscape and local ecology.

The NPPF, at paragraphs 124 and 125, also highlights the importance of delivering housing at densities appropriate to the location. This is to be determined in reference to character and infrastructure, informed by appropriate local guidance. Section 12 of the NPPF, *‘Achieving well-designed places’* provides that good design reflects and protects local character in order to create *‘beautiful and distinctive places’*. This is expanded in paragraph 130 to emphasise the need for well designed places to be conscious of long as well as short term quality of an area along with the sense of managing change in a way that is sympathetic to the history and character of an area. This is further expanded in paragraphs 131-136 to provide additional guidance on the need to incorporate landscape and trees into design for reasons of character, health and wellbeing of future residents, and wider ecological and environmental considerations.

Section 15 of the NPPF, *‘Conserving and enhancing the natural environment’*, reconfirms the commitment to the environment. The core of this is a recognition of the intrinsic value of the natural environment to habitats, ecosystems, and local character. Part of the commitment to protecting the natural environment is the commitment to internationally, nationally, and locally designated wildlife, conservation, and cultural sites.

There are landscape assessments for South Norfolk produced in 2001 and updated in 2012 (henceforth the 2001 Landscape Assessment and the 2012 Landscape Assessment) which will be addressed in detail within this letter.

What is clear from an assessment of the national policy position is that there is a mandate for a significant growth in housing delivery to address the national housing shortage. However, it is equally clear that meeting national housing needs is not to come at the cost of local communities. That new housing provision is to be planned around infrastructure and service capacity along with an overarching protection of the landscape and the environment. This latter point is not only vital to

the preservation of nationally important area of landscape character, of which Norfolk has a great deal, but also serves to protect habitats and stave of climate change.

Environmental concerns relating to SN2064REV / VC ROC2

The 2001 Landscape Assessment makes express reference to the '[h]igh proportion of important ecological assemblages protected as SSSIs including woodland, and wetland habitats'. SN2064REV is within 3km (buffer distance) of SAC, SPA, SSSI, Ramsar, and National Nature Reserve sites which compound the landscape issues with an identified risk to habitats, species, and areas of scientific interest. Again, whilst it is acknowledged that residential development is vital for the development of the district and the county this must be balanced against environmental protection. Protecting the environment is fully supported by national and local policy including DM4.4 of the Local Plan.

Landscape and Character concerns common to SN2064REV / VC ROC2

Policy DM1.3 of South Norfolk's Local Plan which is clear in setting out the rationale behind settlement boundaries and the need to limit development to allocations. That rationale being *'One of the core principles of the National Planning Policy Framework is to ensure that development management decisions take account of different local areas, promote the vitality of urban areas and recognise the intrinsic character and beauty of the countryside, whilst supporting the rural communities within it.'* It is recognised that the proposed allocation if it moves forward would allow development in a location outside of Rockland St Mary's current development boundaries; however, the core of this objection is that the proposed allocations are not sympathetic to the intrinsic character of the area or local communities and thus would conflict with the underlying rationale of the NPPF and Policy DM1.3 of the DMP.

Policies DM4.5 and DM4.9 of the DMP reflect the implementation of national and cross district strategy into development management policy. These two policies work to emphasise the importance of the landscape and the need for any development to factor the landscape, as assessed under the landscape assessments, into design. Balance between the built and natural environment is fundamental to sustainable development and is golden thread running through development management policies – as clear shown by the emphasis placed on development boundaries and rightful reticence surrounding development in the countryside.

The 2001 Landscape Assessment categorises Rockland St Mary as Rockland Tributary Farmland. Volume 1 of 2001 Landscape Assessment describes the character area as having a *'[d]ispersed but evenly distributed settlement pattern of small, nucleated villages and small farmsteads, occasionally with large agricultural sheds'*. What this makes plain is that the pattern of development and thus the character of area, conceived as the relationship between built and natural environment, is one of small scale development creating discrete pockets.

Landscape and character impact of SN2064REV / VC ROC2 was objected to by South Norfolk's Senior Heritage and Design Officer who notes that the allocation would mark a departure from the linear pattern of development characteristic of Rockland St Mary. They go on to notes that whilst there are non-linear areas of development at either end of the village the *"Introduction of a third*

central clustered area would create more of precedent for other backland areas to be developed in the same vein, fundamentally changing character of the village. I therefore have townscape concerns’.

The 2001 Landscape Assessment and South Norfolk’s Place Making Guide SPD 2012 provide that the key landscape features of Rockland Tributary Farmland are the long views to the south, the rural character provided by small linear villages dispersed across the landscape, and skyline that results from large open areas that are relatively flat topographically. With core development priorities being the retention or enhancement of the trees within the landscape and the preservation of historic village cores.

SN2064REV / VC ROC2 would introduce an estate like pattern of development to the centre of the village which has retained its linearity and character. Allocation of SN2064 /VC ROC2 would not only detract from the linearity of the village would restrict the views to the south that typify the area.

The assessment notes that there is development further south along The Street but this takes insufficient account of the qualitative difference between the allocation and this development. The development to the south is linear and follows the curve of the road; the allocation would form an estate.

Allocation at a density of 25 dwellings per hectare, as proposed, is significantly more dense than the surrounding dwellings and would constitute another form of departure from the character of Rockland St Mary. Policy DM3.8 of the DMP provides that development should reflect the prevailing character of an area.

Whilst an allocation is not determinative of the final form and layout of the application that comes forward it will play a strong role in shaping the application given this it is difficult to see how a sympathetic application can come forward on a site that is unsympathetically located and with a proposed density than could only be achieved with a layout uncharacteristic of the area. The incongruity of the allocation’s location is highlighted by the lack of street frontage marking it a new and contrived extension to the village.

SN2064REV / VC ROC2 impact on amenity

SN2064REV / VC ROC2 as backland development, presents an inherent risk of overlooking, loss of privacy, and the potential for noise and disturbance. The proposed access for SN2064 presents a considerable risk for noise and disturbance to existing neighbours and potential future occupiers. The proposal to take access through the surgery is contrived and the Highways Team has raised objections. The access would serve 25 dwellings and run immediately adjacent to the side of two existing dwellings and the doctors surgery. On this basis the allocation conflicts with Policy DM3.8 of the DMP.

The level of growth proposed is out of proportion to Rockland St Mary and would create unacceptable pressure on the level of services provided within the village. It is acknowledged that the site was ranked Green as part of the HELAA assessment of service accessibility; however, this ranks availability not on capacity but on proximity. It is therefore not indicative of whether there would be sufficient service capacity within the village for the level of growth to be considered sustainable. This brings the allocation into conflict with Policy DM1.3 of the DMP.

SN2064REV / VC ROC2 impact on access and highway safety

The assessment of the site recognises that the proposed access is '*tight*' given that the proposed access is surrounded by land currently in use there appears limited scope to widen the access. This raises questions over whether adequate visibility splays can be provided and whether the access would be wide enough for vehicles to pass each other – a more significant question remains over whether pedestrian access could simultaneously be provided.

The level of development proposed would be out of proportion to the employment opportunities within Rockland St Mary and increase commuting and travel pressure. Pressure on the roads at this level is likely to compromise highway safety. This would also thereby contribute to the continuation of less sustainable modes of transport and would conflict with Section 9 of NPPF, 'Promoting sustainable transport' and Policies DM3.10 and DM3.11 of the DMP. Rockland St Mary already suffers issues with school parking at times of drop off & school end. There are significant level of cars parking down the street outside of driveways & blocking driveways. Footpaths are not wide enough & would not cope with extra footfall at the centre of the village which could cause accidents between cars & pedestrians. Accidents have already occurred in Rockland due to lack of & width with footpaths.

A third party owns the access route to the proposed development via the Doctors Surgery, the access is not guaranteed and therefore this site should no longer be proposed for allocation.

Deliverability

The substandard access arrangements, with no practical resolution, means that the site may be allocated with no realistic hope of development. This is directly contrary to Section 5 of the NPPF which provides that allocations for development must be deliverable.

Summary and Conclusions

There is a broader point seen across the national and local policy position which is that delivering the housing that is needed nationally will require development; however, this may be better achieved by focussing that development in larger settlements better able to absorb growth and where large amounts of housing needs to be delivered this is often best achieved through new settlements.

The relevance of this point is that **SN2064REV / VC ROC2** is large relative to the size of Rockland St Mary and the comments made as part of the assessment suggesting that the site could expand further bearing in mind that the JCS considered non-NPA (Norwich Plan Area) Service Villages suitable for 10-20 dwellings, this is a very significant increase and out of proportion to the general increase in delivery seen in the GNLP overall.

SN2064REV / VC ROC2 represent material threats to the character of the area, as described within the Landscape Assessment, and as has been shown are in clear conflict with local and national policies.

SN2064 is a clear step away from the linear character of Rockland St Mary. Thus, conflicting with Policies DM1.4, DM4.5, and DM4.9 of DMP.

The allocations would represent a level of development significantly above the levels development considered sustainable. This would lead to an unacceptable level of pressure on services and transport links and call into question the assessment of site under HELAA as Green – owing to quantity of development. This means the proposed allocations conflict with Policies DM1.1, DM3.10, DM3.11, DM3.13, and DM3.14 of the DMP.

The allocation risk development that would result in a loss of privacy and overlooking and so would conflict with Policies DM3.8 and DM3.13 of the DMP.

The proximity of the proposed allocations to environmentally sensitive sites conflicts with Policy DM4.4 of the DMP.

Rockland St Mary already suffers issues with on street parking & the development would add to this issue. Footpaths are not wide enough.

In conclusion the proposed allocation is above and beyond the identified level of sustainable growth for Rockland St Mary and pose a clear risk to the identified character of the area and the and quality of life of those current inhabit the village and the would be occupiers of any development built on the proposed allocations. Extra pressure on the roads are likely to compromise highway safety. A third party owns the access route to the proposed development via the Doctors Surgery, the access is not guaranteed and therefore this site should no longer be proposed for allocation .

Yours faithfully,

Mr and Mrs Ringwood,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]