

EVIDENCE BASE

FOR THE SAHAM TONEY NEIGHBOURHOOD

DEVELOPMENT PLAN 2018 - 2036



VOLUME 1

SAHAM TONEY'S KEY DEVELOPMENT CONSTRAINTS

REGULATION 14 PRE-SUBMISSION PUBLICATION

TABLE OF CONTENTS

2. Key Constraints Planning Assessment Principles	2
3. Landscape Setting and Character.....	3
4. Availability of Services	8
CONSTRAINTS MAP A: NEIGHBOURHOOD AREA BUS ROUTE.....	11
CONSTRAINTS MAP B1: COMMUNITY FACILITIES	12
CONSTRAINTS MAP B2: COMMUNITY FACILITIES - WELLS COLE COMMUNITY CENTRE	13
CONSTRAINTS MAP B3: COMMUNITY FACILITIES - ST. GEORGE'S CHURCH	14
CONSTRAINTS MAP B4: COMMUNITY FACILITIES - METHODIST CHAPEL	15
CONSTRAINTS MAP B5: COMMUNITY FACILITIES - SPORTS & SOCIAL CLUB	16
CONSTRAINTS MAP B6: COMMUNITY FACILITIES - BROOM HALL HOTEL.....	17
CONSTRAINTS MAP B7: COMMUNITY FACILITIES - THE OLD BELL INN.....	18
CONSTRAINTS MAP B8: COMMUNITY FACILITIES - PENNY'S TEA ROOM & LOWE'S CARAVAN PARK	19
CONSTRAINTS MAP C: NEAREST SHOPS	20
CONSTRAINTS MAP D: LOCAL SCHOOLS.....	21
5. Housing Need.....	22
5.1 Age Demographics.....	22
5.2 Dwelling Size Demographics.....	22
5.3 Dwelling Type Demographics	23
5.4 Housing Tenure Demographics	24
5.5 People per Household	24
5.6 Interpretation of Demographic Data.....	24
6. Roads and Public Transport	25
6.1 Roads	25
6.2 Public Transport.....	26
6.3 Pedestrian Access	26
CONSTRAINTS MAP E: MAIN VEHICLE ROUTES AND PAVEMENTS.....	27
7. Flood Risk	28
CONSTRAINTS MAP F: SAHAM TONEY WATERCOURSE	32
CONSTRAINTS MAP G: SURFACE WATER FLOOD RISK	33
CONSTRAINTS MAP H: FLOOD RISK FROM RIVERS.....	34
8. Availability of Suitable Land for Development	35
CONSTRAINTS MAP I: SITES ASSESSED BY BRECKLAND COUNCIL, 2014	36

1. Introduction

1.1 Due to a range of factors the opportunities for land development in Saham Toney are limited. These limitations shall be a key and fundamental consideration for all those who may put forward planning proposals, review them and/or make decisions about them.

1.2 Consideration of the constraints shall always take precedence over any numerical housing allocation or target.

1.3 The key constraints fall into the following categories:

- Landscape setting and character;
- Availability and accessibility of services and facilities;
- Housing need;
- Roads and public transport;
- Flood risk;
- Availability of suitable land for development.

1.4 Each of these is discussed in detail in this document, but it is the responsibility of all those submitting, reviewing and deciding planning applications for the Neighbourhood Area to ensure they have the most up to date and most comprehensive data and to account for any other constraints that may pertain to a particular site or which may arise generally over the life of this Plan.

2. Key Constraints Planning Assessment Principles

2.1 The following guidelines should be followed when assessing or deciding planning applications in the Neighbourhood Area:

- A. Uncontrolled, poorly managed or unsympathetic development is likely to harm highly sensitive local landscape and settlement character, and is to be avoided.
- B. There are no shops or other services in the Neighbourhood Area and the nearest are significantly further than the recommended maximum walking distance. This together with further constraint on roads and pedestrian pavements means that the presence of services in Watton shall not be considered as demonstrating the ability of Saham Toney to sustain development.
- C. Education facilities in the Neighbourhood Area are limited without travelling well beyond Breckland's maximum walking distance. This shall be taken into account when considering the location of proposed developments.
- D. Housing needs for the Neighbourhood Area differ significantly from those for Breckland as a whole and must be specifically taken into account when considering development proposals.
- E. The rural road network, public transport provision and the lack of paved footpaths in the Neighbourhood Area combine to place both capacity and safety constraints on the level of new development that can be supported.
- F. Surface water flooding is the key flood risk in the Neighbourhood Area. No development that adds individually or cumulatively to that risk shall be permitted unless it includes robust and substantiated mitigation measures.
- G. The suitability and constrained capacity of any proposed development site shall be rigorously assessed against the constraints outlined in this document.
- H. Nothing in this document shall be taken to exclude from consideration any other constraints that may exist or come to light in the future.

3. Landscape Setting and Character

3.1 Primary reference: Breckland Settlement Fringe Landscape Assessment July 2007

3.2 Breckland's assessment divides Saham Toney into two landscape areas:

ST1: Saham Toney South West; and

ST2: Saham Toney North, West, East.

As shown on the map below:



3.3 Area ST1 is an enclosed parkland landscape of pasture, small woodland blocks, and tree lined watercourse. It is a transitional area with the adjacent B5: Wissey Tributary Valley landscape sharing similar characteristics.

3.4 The Breckland assessment concludes it is "A landscape in good condition with a distinctive tributary valley character. These qualities would be highly sensitive to further expansion of development associated with Saham Toney or Watton."

3.5 The area is defined as highly sensitive to development both with respect to its landscape character and visually as follows:

3.5.1 Area ST1: Visual Sensitivity

Criteria	Judgement and Comment
General Views (Landform and Enclosure): Views within the landscape are contained by tree cover. North west of Church Farm views are more open.	The enclosed character and presence of woodland blocks and parkland contributes to the distinct rural character which is sensitive.
Intervisibility with the settlement edge: Views to the settlement edge: There is limited public access into the area and no points at which the settlement edge can be viewed. The low density and low rise nature of residential development and presence of tree cover limits views. Views from the settlement edge: Trees and woodland filter views from the settlement edge.	The good rural-settlement interface is sensitive to further development infilling which could create a harsher settlement edge.
Mitigation Potential: Plantation blocks, copses and waterside trees are a feature of the landscape.	The character area is not sensitive to mitigation planting.

3.5.2 Area ST1: Landscape Character Sensitivities

Criteria	Judgement and Comment
Landscape Quality and Condition	
An intact estate landscape of pasture, small woodland blocks, and tree lined tributary watercourses.	A landscape in good condition with a distinctive tributary valley character. These qualities would be highly sensitive to further expansion of development associated with Saham Toney or Watton.
Individual Elements	
Natural: Valued natural features are the watercourse (Watton Brook), grazed pasture and woodland blocks. The wet woodland alongside the watercourse 'The Grove' is a county wildlife site.	The aim should be to conserve and enhance the natural character of the landscape. These features would be sensitive to further extension of development.
Cultural (inc. built/architectural): The area has a strong 'estate' character associated with the Halls (Broom Hall and Saham Hall).	The 'parkland' landscape of the Halls is sensitive.
Aesthetic/perceptual: A distinct rural landscape separating Watton and Saham Toney.	The rural 'gap' between Watton and Saham Toney is sensitive to any further encroachment of development.
Character of the Settlement Edge	
Settlement Edge Development Type: This settlement edge of Saham Toney comprises a single line of dwellings along Richmond Road. Predominantly late 20th century low density residential development and closer to the church a terrace of Victorian cottages.	A low density well integrated settlement edge. It is sensitive to creation of large blocks of infilling development which would change the character.
Accessibility and Integration: The low density and single line of development creates a well integrated edge. There is limited access into the adjacent landscape.	It is considered that further expansion / development with large blocks of infill would change the rural character of this edge of Saham Toney, creating the appearance of an expanded edge of Watton.

Gateways: This is a low key gateway to Saham Toney – the crossing of the river (Watton Brook) and views to the dominant church tower on rising land to the north create the impression of a distinct rural village, although actual gap between Watton and the edge of Saham Toney is relatively small (less than 200m).	The function of the landscape is creating a distinct rural setting to Saham Toney and separation from Watton is highly sensitive.
Nodes: The church of St. George on rising land to the north, small green and older properties south of the church form a distinct node and strong sense of place.	The setting of these buildings is sensitive.

3.6 The overall sensitivity judgement of the assessment for area ST1 concludes:

"Overall the sensitivity of the area to further expansion of Saham Toney/Watton is judged to be **High**. This judgement relates to the role of tributary valley and parkland/pasture and woodland setting in defining the separation of Saham Toney and Watton and creating a strong rural character to this edge of the village."

3.7 The landscape guidelines given in Breckland's assessment for area ST1 underpin and justify policies to preserve the strategic gap to Watton (Policy 5), to avoid the creation of further large blocks of development (Policy 2), to conserve the low density residential development (Policy 3) and to conserve the undeveloped green areas, views and wildlife (Policies 7A, 7B and 7C).

3.8 Area ST2 comprises a gently undulating land form, tributary streams, arable and pasture farmland and small blocks of farm woodland. The land immediately surrounding the village is predominantly pasture, enclosed by hedgerows with considerable areas of wet woodland, including the willow and poplar vegetation fringing Saham Mere. To the north and both west the landscape is more typically an open arable landscape forming the transition with the higher plateau landscape.

3.9 The area is defined as highly sensitive to development both with respect to its landscape character and visually as follows:

3.9.1 Landscape Character Sensitivities

Criteria	Judgement and Comment
Landscape Quality and Condition	
Essentially a mix of pasture and wet woodland forming an enclosed setting to the settlement. A managed rural landscape. Some more open arable landscape, notably north of the sports ground and adjoining settlement on the lane to Saham Hills.	A landscape with a distinctive tributary valley character, with the pasture and tree cover providing a strong rural setting to the village. These qualities would be sensitive to further expansion of development.
Individual Elements	
Natural: Valued natural features are the areas of grazed pasture, woodland and the groundwater fed Saham Mere.	The aim should be to conserve and enhance the natural character of the landscape of pasture and woodland. These features would be sensitive to further extension of development. Further development may also have an adverse affect on the groundwater-fed mere.
Cultural (including built/architectural): A number of historic buildings. The church of St. George with its tower forms a landmark feature, plus a windmill (no sails) on Ovington Road.	These features contribute to the character of the village. They are not individually sensitive to further small scale development.

Aesthetic/perceptual: A distinct rural landscape of wetland, woodland and pasture forming an enclosed setting to the village. To the north a more typical open, arable landscape.	The strong rural character of the landscape and setting of the village within the tributary valley is sensitive to further expansion of development.
Character of the Settlement Edge	
Settlement Edge Development Type: The settlement edge of Saham Toney is very diverse and varies within each settlement cluster/line. In some areas back garden boundaries/fences form the boundary with the surrounding agricultural landscape. In other areas residences run along a road fronting onto agricultural land. On the road to Saham Hills a single line of dwellings runs either side of much of the road.	There are sensitivities relating to the merging of the existing small settlement clusters into a larger consolidated development. Where linear development extends as a single line along the road, backland or infill development would create a more solid defined settlement edge, with loss of permeability and views out. Generally, the loose, informal character of Saham Toney is considered to be sensitive to further development which would create a more consolidated settlement form.
Accessibility and Integration: The settlement edge is generally well integrated. Although there are few recreation/access connections the settlement edge is visually permeable. For example, along Saham Hills Road there are frequent views out between houses or views down rural lane and tracks, which create a well integrated settlement edge. Some edges, for example, along the road west of the church where a line of houses faces directly onto the open arable landscape, are less well integrated.	It is considered that further expansion / development would change the rural character of the edges of Saham Toney.
Gateways: Each settlement cluster is entered via has a low key gateway with the adjacent rural area.	The function of the landscape is creating a distinct rural setting to the different settlement areas within Saham Toney and separation from Watton is highly sensitive. The areas of rural landscape between each settlement cluster, although small, are important in creating the character of Saham Toney
Nodes: The main nodes are Saham Mere and pub and the crossroads at Mill corner, and the church. This is a diffused/dispersed settlement with no real 'centre'	Low key dispersed character of Saham Toney is sensitive to expansion/consolidation of the settlement form. The setting of the church is sensitive.

3.9.2 Visual Sensitivity

Criteria	Judgement and Comment
General Views (Landform and Enclosure): Views within the landscape are contained by tree cover. North west of Church Farm views are more open.	The enclosed character and presence of woodland blocks contributes to the distinct rural character which is sensitive.

<p>Intervisibility with the settlement edge: Views to the settlement edge: There is limited public access into the area and few points at which the settlement edge can be viewed. The low density and low rise nature of residential development and presence of tree cover limits views.</p> <p>Views from the settlement edge: Trees and woodland filter views from the settlement edge. The low density of development – often a single linear line allows views out between houses and along tracks to the wider rural landscape.</p>	<p>The good rural - settlement interface is sensitive to further development infilling which could create a more solid settlement edge.</p>
<p>Mitigation Potential: Plantation blocks, copses and waterside trees are a feature of the landscape.</p>	<p>The character area is not sensitive to mitigation planting.</p>

3.10 The overall sensitivity judgement of the assessment for area ST2 concludes:

"Overall the sensitivity of the area to further expansion of Saham Toney is judged to be **High**. This judgement relates to the role of tributary valley landscape and pasture in providing a distinct setting to the settlement which would be sensitive to change, and the potential for further development to change the loose, informal settlement pattern and create a more consolidated developed area."

3.11 The landscape guidelines given in Breckland's assessment for area ST2 underpin and justify policies to conserve the setting of the Mere (Policies 7A and 7B), to avoid the creation of further blocks of development (Policy 2A), to conserve the low density residential development (Policy 3), to conserve views (Policy 7B) and to conserve the undeveloped land and wildlife (Policy 7C).

4. Availability of Services

4.1 Primary reference: Breckland Local Service Centre Topic Paper July 2017

4.2 In its evidence base for the Local Plan Breckland Council recognises a need to ensure "Issues around rural isolation, inaccessibility to services and reliance on the private car are not exacerbated by new development."

4.3 The National Planning Policy Framework, paragraph 55 states "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."

4.4 Breckland Council recognises that "it is important to address issues such as access to services and significant local housing need that would promote sustainable development in rural areas."

4.5 Within the Breckland development hierarchy Local Service Centre Villages are considered to be those that contain all of the following services and facilities to meet the day-to-day requirements of their existing residents:

- a. Public Transport - the level of public transport access within the village, the frequency of services and the possibility to reach a higher order settlement in normal working hours;
- b. Community facility - this can include a number of different facilities such as a village hall, public house, restaurant or café.
- c. Employment - the level of employment available within a village, including whether there is a business park and also the size of the businesses within the settlement.
- d. Shop/Post Office
- e. School

4.6 In its document Locational Strategy, Level and Location of Growth and Rural Areas July 2016, Breckland Council stated that "services and facilities should only be considered to be available where they are within a recognised acceptable walking distance." The Government accepts the guide "Providing For Journeys on Foot" by the Chartered Institution of Highways and Transportation, as such a recognised source of information on this topic, and it categorises walking distances as follows:

	Town centres (m)	Commuting, school, sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	120

4.7 One bus service operates a route through Saham Toney, at hourly intervals during working hours. There are 4 bus stops in either direction as indicated on Map A, which shows that many residents live more than Breckland's acceptable walking distance of 800m from those bus stops.

4.8 There are a limited number of community facilities in the Neighbourhood Area, as shown on Constraints Map B1. Maps B2-B8 show that for each of these facilities many of the Area's homes lie further than Breckland's acceptable 800m walking distance from the facility.

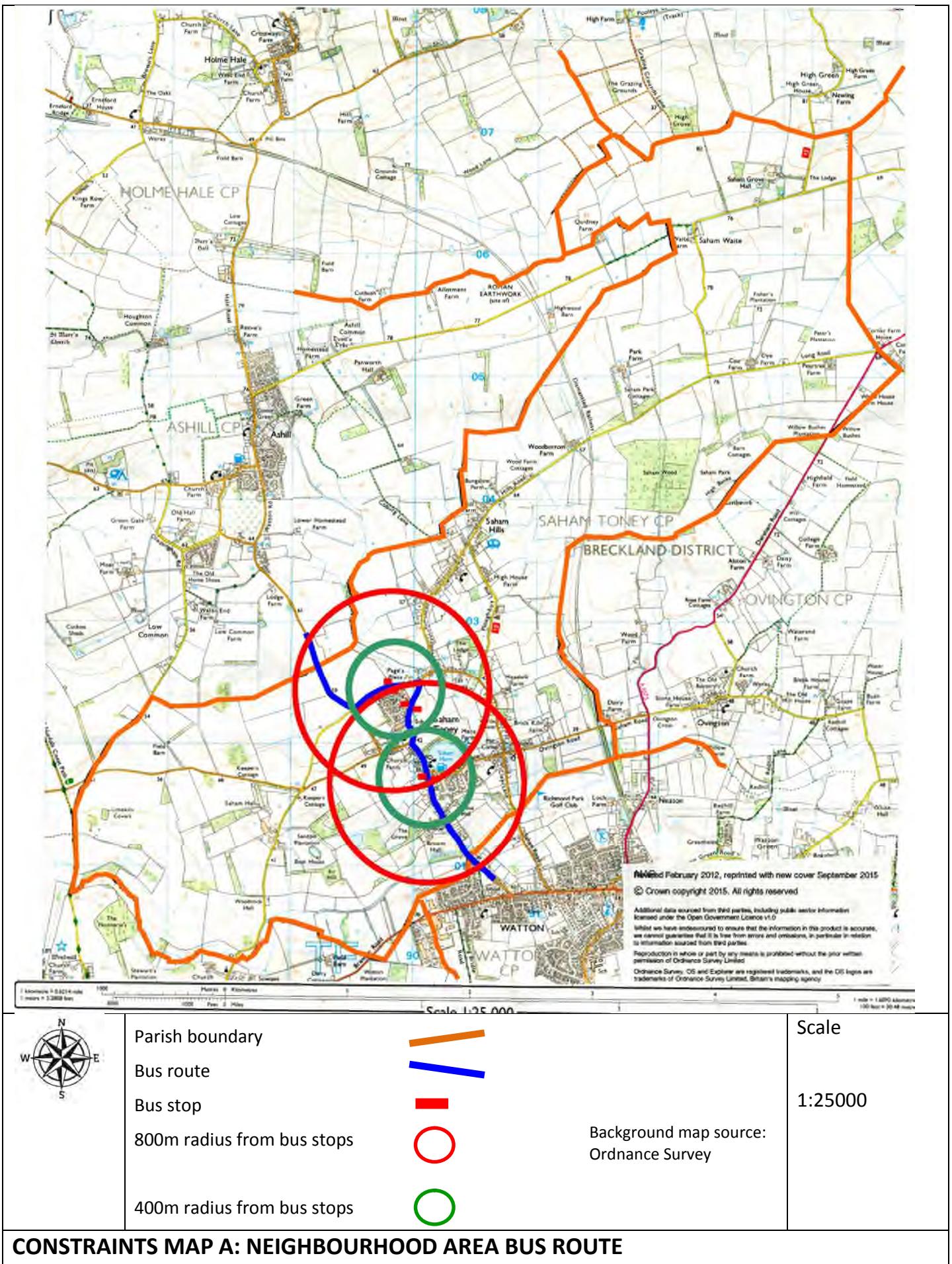
4.9 There are no shops in Saham Toney, nor does it have its own post office; just a visiting one that opens for only 4½ hours each week. The nearest are in neighbouring Watton. The Watton facilities are often quoted by developers as proof of the availability of services and therefore of the sustainability of Saham Toney for development; but as can be seen from Constraints Map C, no part of the Neighbourhood Area is within Breckland's recommended 1200m maximum walking distance from those shops. Indeed most parts of the Area are significantly further than that distance from the nearest shops. Furthermore there is only one paved pedestrian route between Saham Toney and Watton, along one side of Richmond Road. A similar pattern is repeated for other services, such as medical and dental practices, library, banks etc. This clearly indicates that in terms of accessible and available services, the Neighbourhood Area must be seen to have very limited sustainability and that must be taken fully into account when considering the size and location of proposed developments and their cumulative extent.

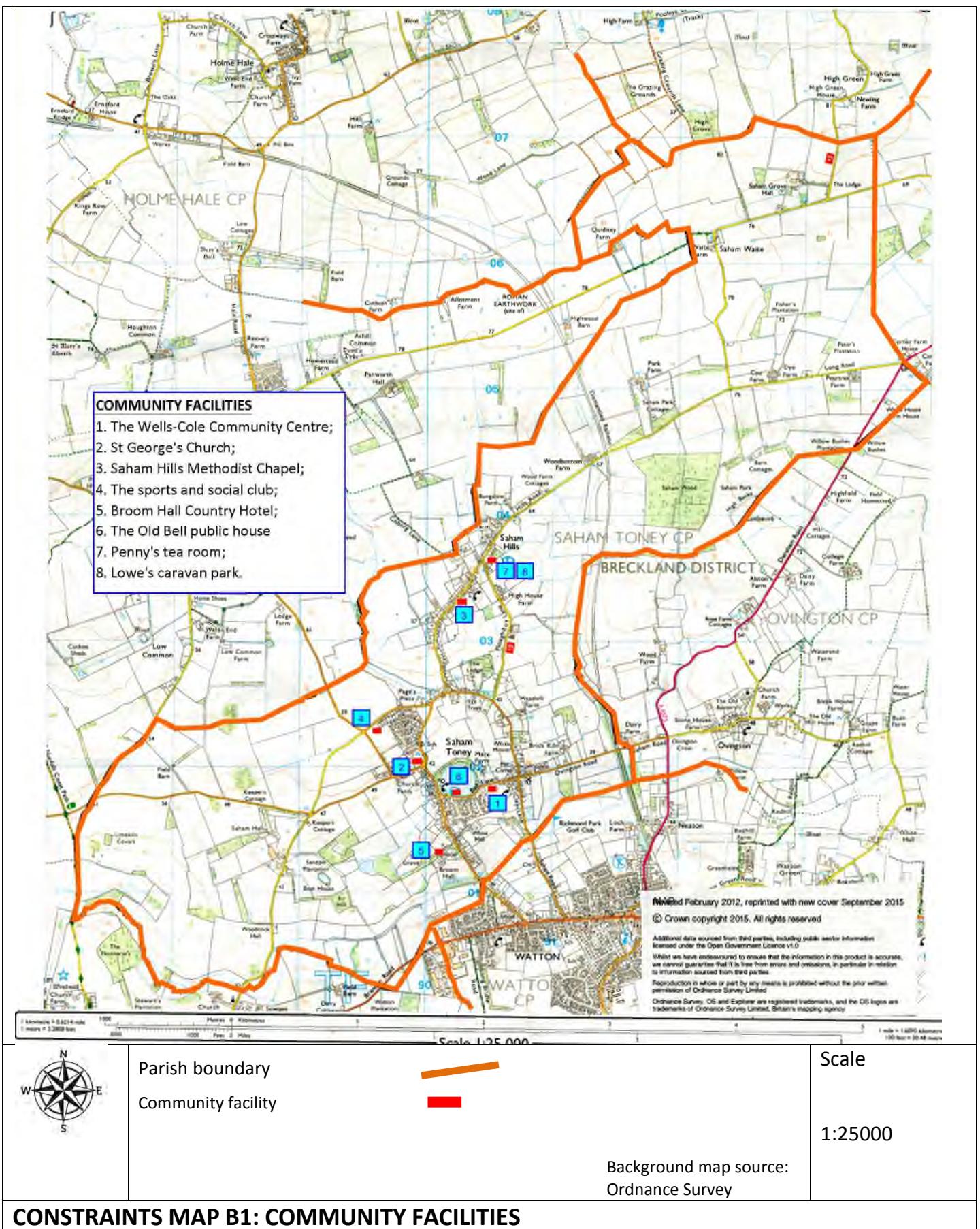
4.10 Saham Toney has a primary school that serves 100 pupils aged 4-11 including those from surrounding parishes as well as Saham Toney. It is fully subscribed and not all Parish children are allocated a place there. There is no pre-school or secondary school; the nearest are in neighbouring Watton, but for secondary education beyond the age of 16 pupils must travel further afield. Constraints Map D shows that the primary school is more than Breckland's recommended 1200m maximum walking distance from many parts of the Neighbourhood Area, while pre-school and secondary education facilities significantly exceed that distance for the entire Neighbourhood Area.

4.11 Of the 41 businesses operating in the Neighbourhood Area (as listed by the Institute of Directors), most are operated from the owners' homes. Only 7 have dedicated premises, as listed below.

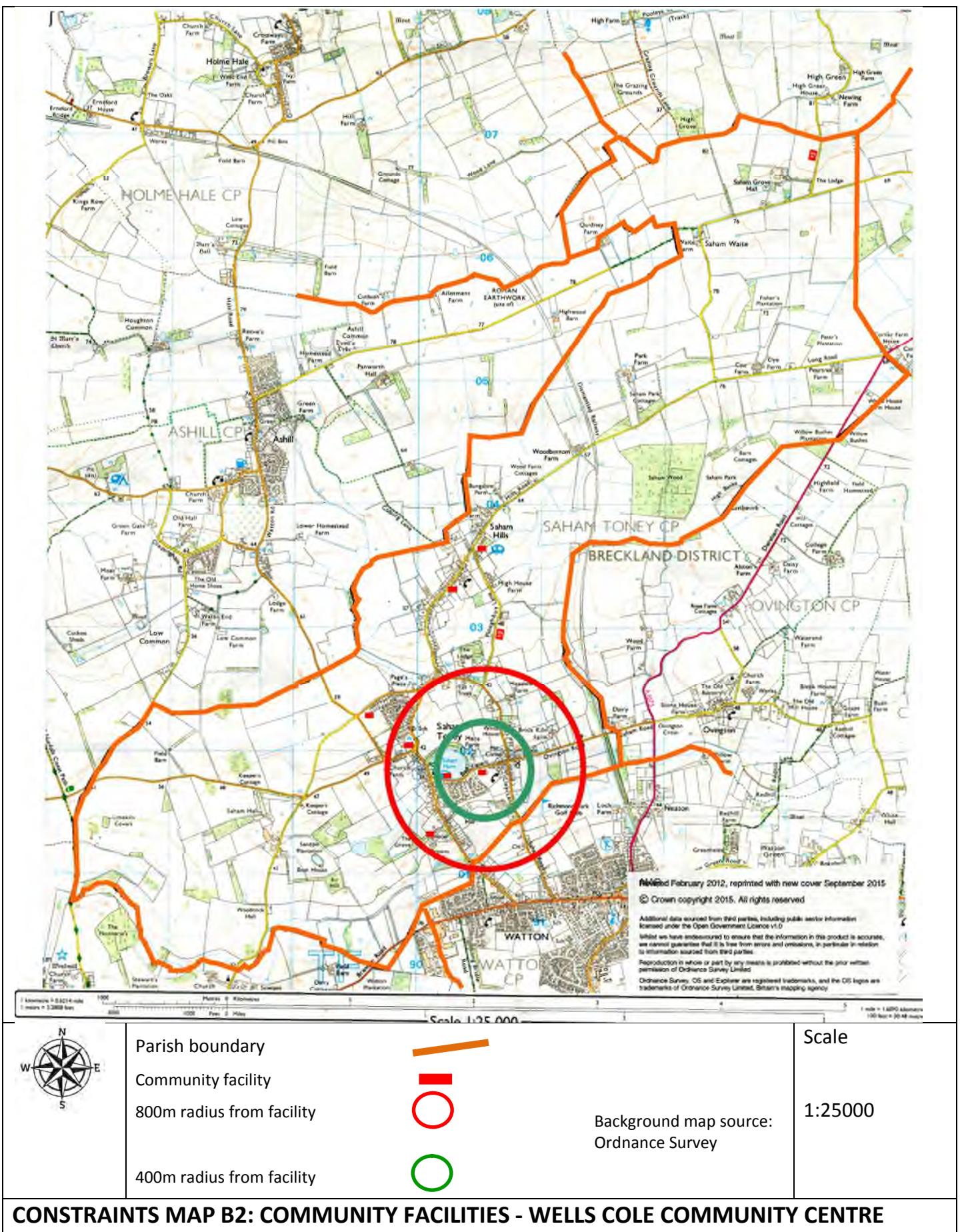
BUSINESSES WITH DEDICATED PREMISES
BROOM HALL HOTEL
LOWE'S CARAVAN PARK
NORFOLK COLONIAL HOMES LIMITED
PENNY'S TEAROOMS
SU-BRIDGE PET SUPPLIES LIMITED
THE OLD BELL INN
WISPY MEADOWS LTD
BUSINESSES RUN FROM HOME
ALBEN HEAT (UK) LIMITED
ANDREW HARROLD TREE AND GARDEN SERVICES LD
ART TECH LIMITED
ARTYFAKES ACTION PROPS LTD.
BOUNCE-ALOT LTD
COOPERS GROUP LTD
DANNYS AVIONICS LIMITED
EAST ANGLIAN INVENTORY SERVICES LTD
ELLA ROBERTS (NEE FICKLING) MEMORIAL CHARITY FOR SAHAM TONEY
EU-NITECH PERSONNEL LTD
FRIENDS OF CHERNOBYL'S CHILDREN (BRECKLAND)
HART INDUSTRIAL SOFTWARE LIMITED
HEALTHCARE GOVERNANCE SOLUTIONS LLP
LORNA LYONS-SMITH LTD
LOUDOUN CONSULTANCY SERVICES LTD
MAURICE YOUNG CONSULTING LIMITED
N MORLEY LIMITED
NORWICH ANGLICAN CURSILLO
OCEAN REMIX LIMITED
PARAGON MOTION CONSULTING LIMITED
PAUL CROSS LEISURE LIMITED
PAUL GARNER DEVELOPMENTS LTD.
RICHMOND KETTLE COMPANY LIMITED
RT GODDARD Hill Farm,
STANWAY BOARDING KENNELS
SWYP LTD
TABLETS 4 LESS LIMITED
THE ENTERPRISING COMPANY LIMITED
THE OVATION HIGH FIDELITY COMPANY LIMITED
THE RAPTOR TRUST
THE STABLES BEAUTY SALON,
THE WONDER WOOD LIMITED
TRELL CONTRACTORS (WATTON) LIMITED
WAVE ENGINEERING LIMITED

4.12 Due to the lack of necessary services, since September 2016 Saham Toney is no longer classified as a Local Service Centre in the emerging Local Plan, but instead as a Rural Settlement With Boundary.

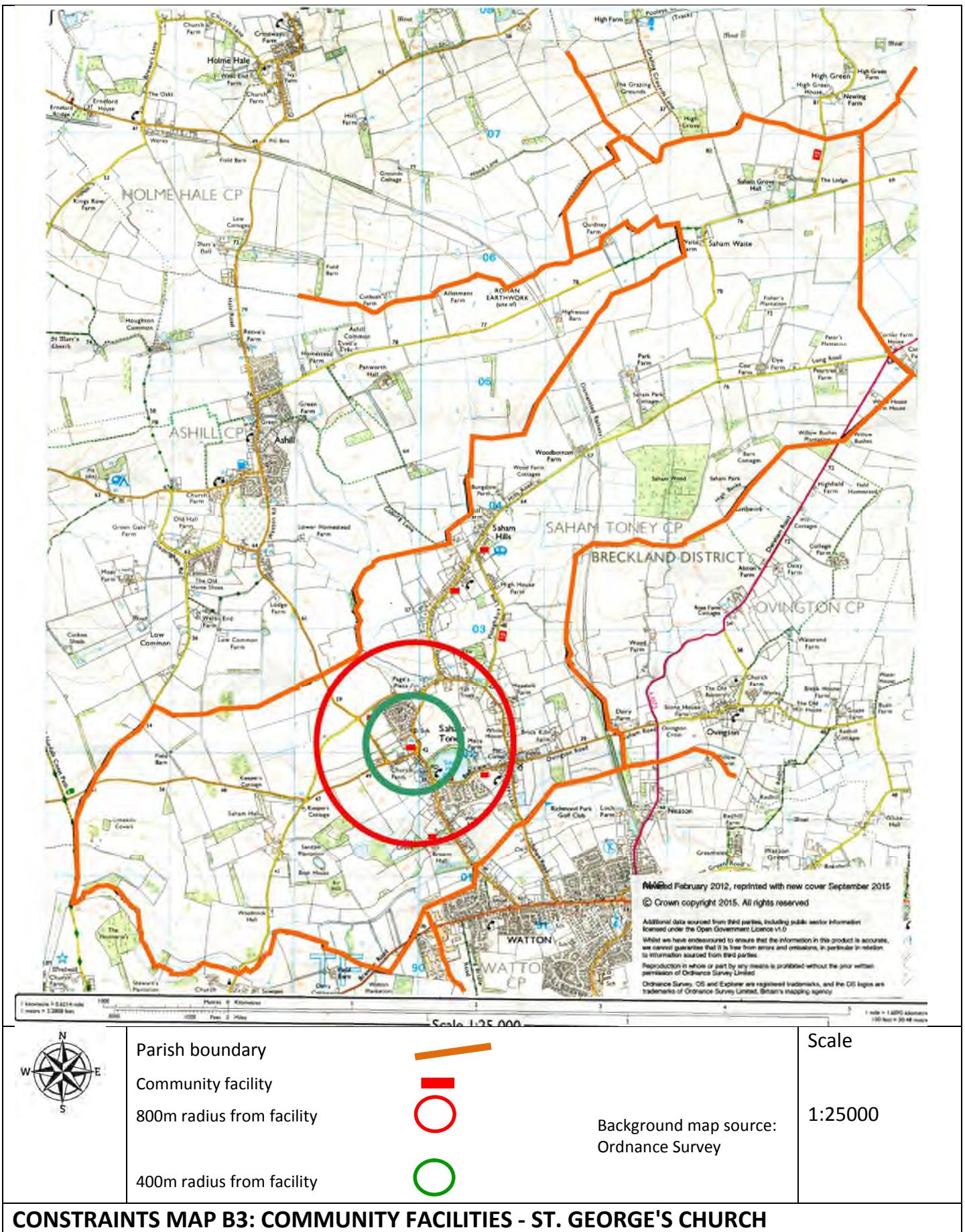




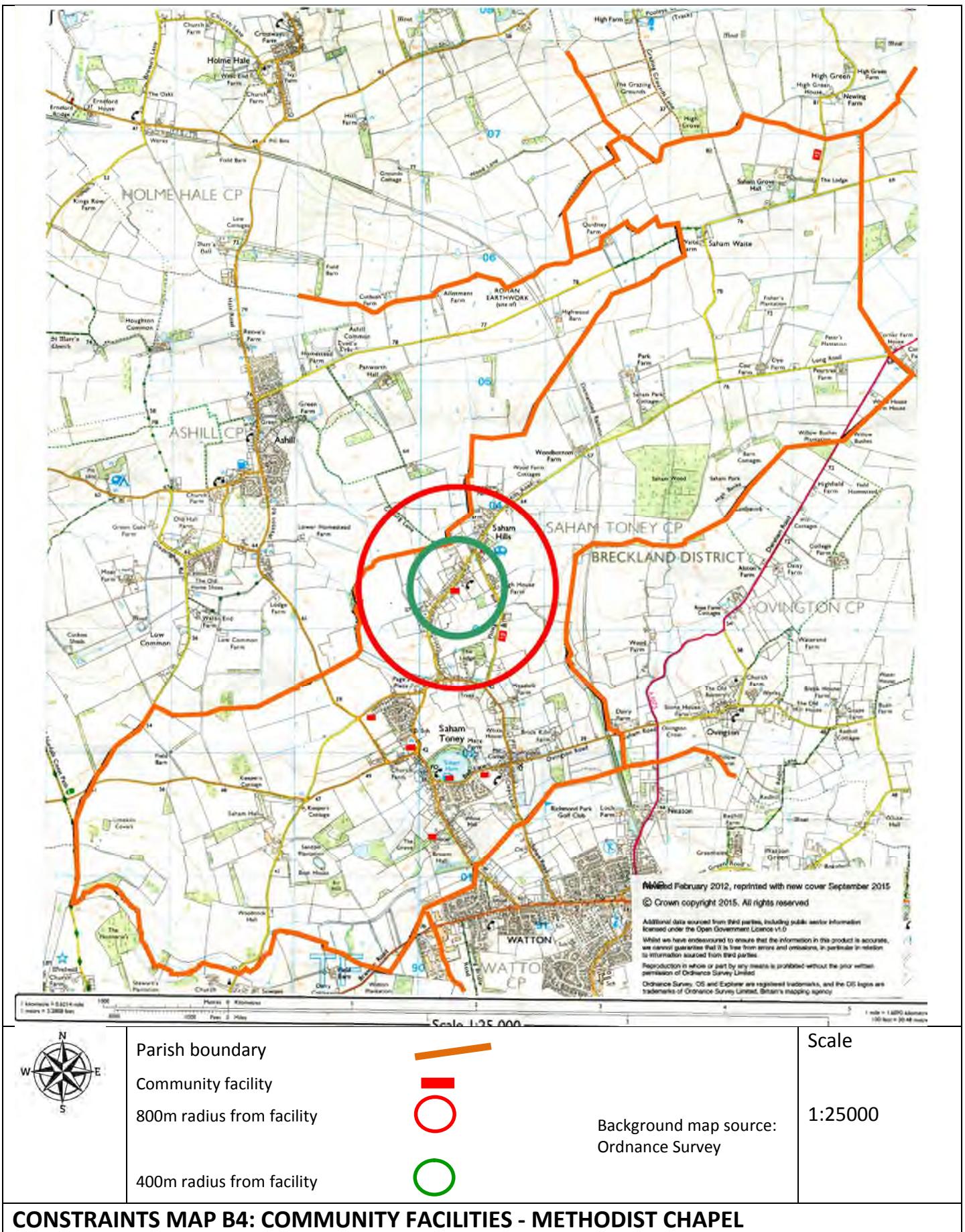
CONSTRAINTS MAP B1: COMMUNITY FACILITIES



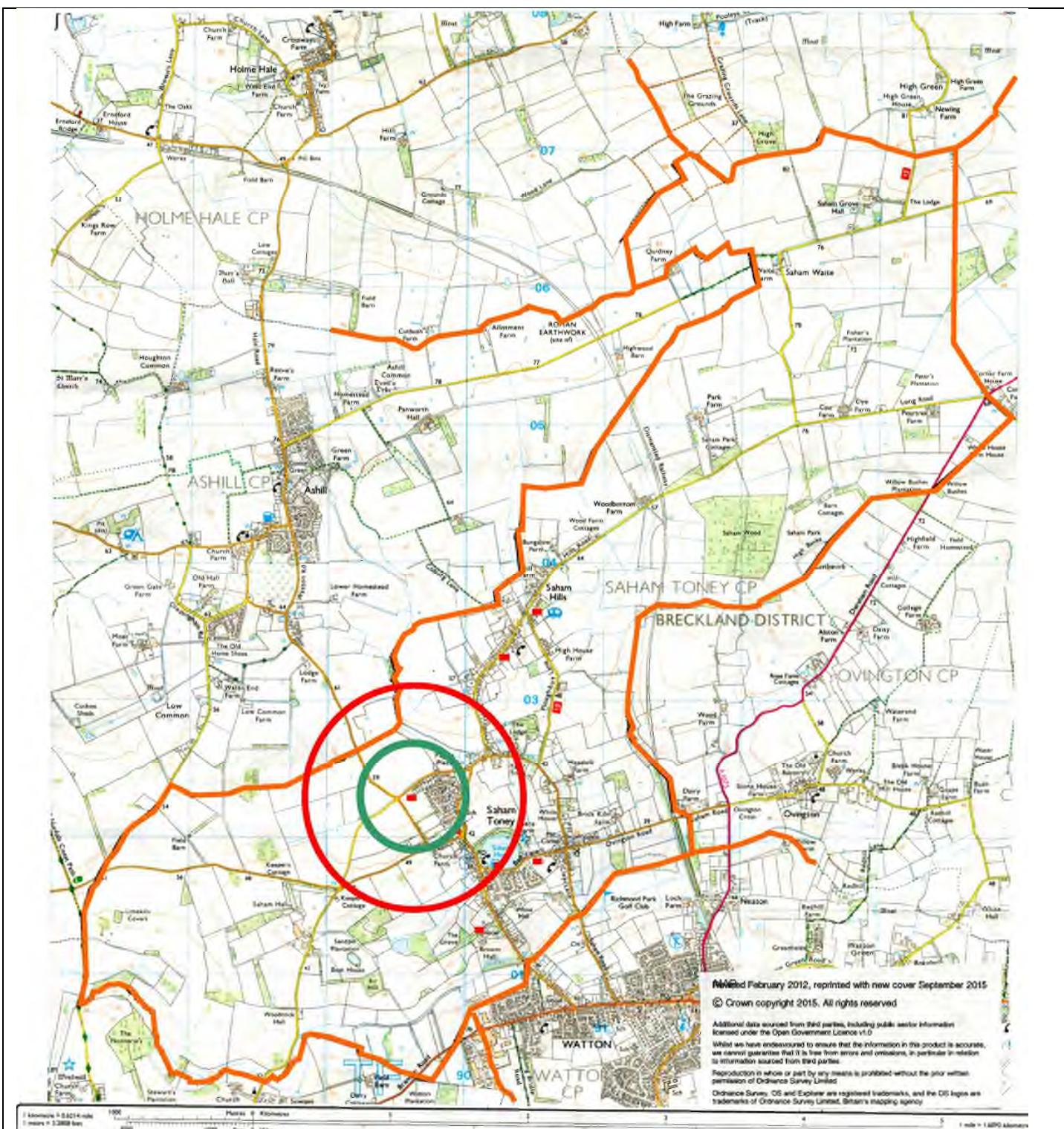
CONSTRAINTS MAP B2: COMMUNITY FACILITIES - WELLS COLE COMMUNITY CENTRE



CONSTRAINTS MAP B3: COMMUNITY FACILITIES - ST. GEORGE'S CHURCH

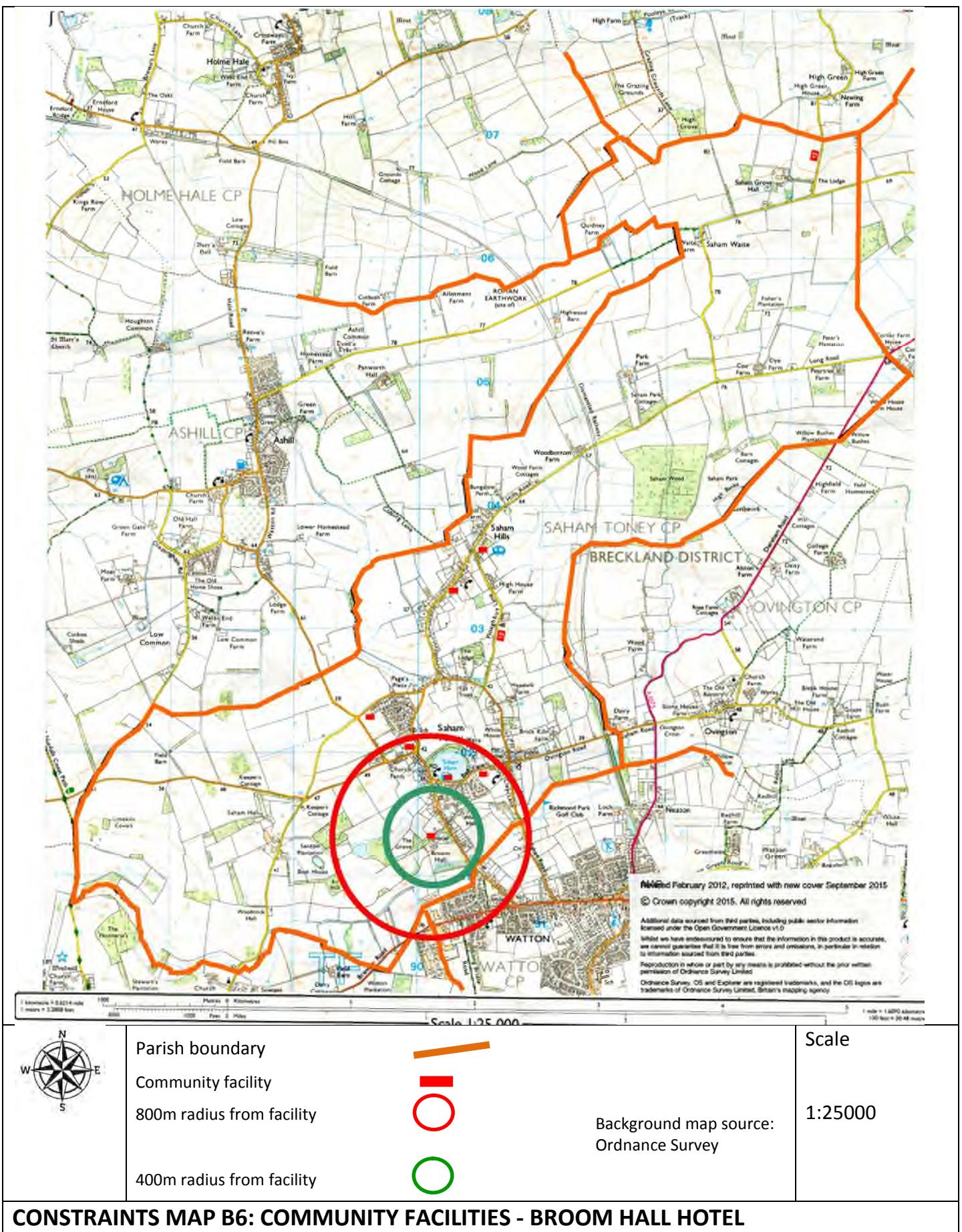


CONSTRAINTS MAP B4: COMMUNITY FACILITIES - METHODIST CHAPEL

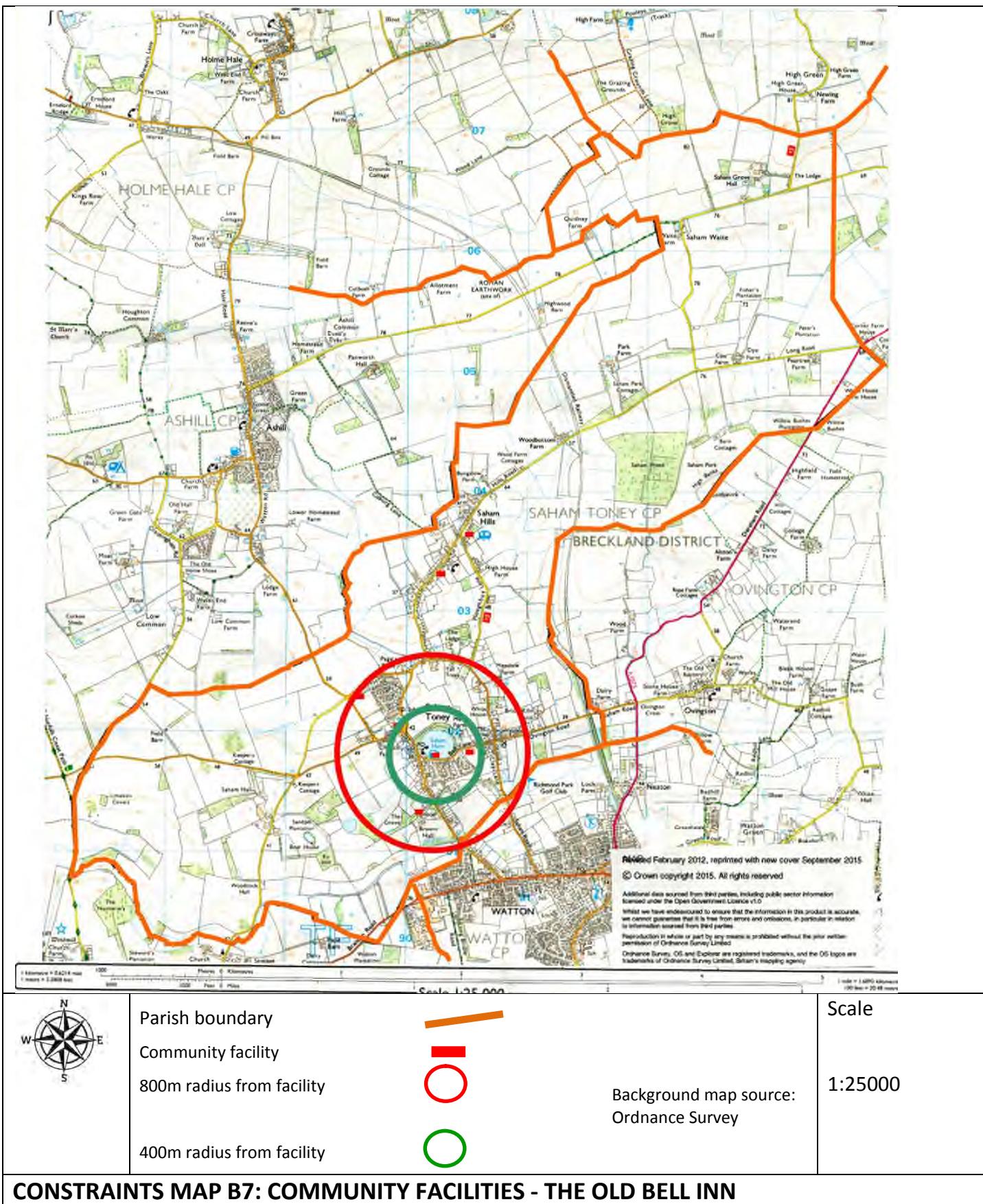


 Parish boundary Community facility 800m radius from facility 400m radius from facility		Scale 1:25 000
		Background map source: Ordnance Survey

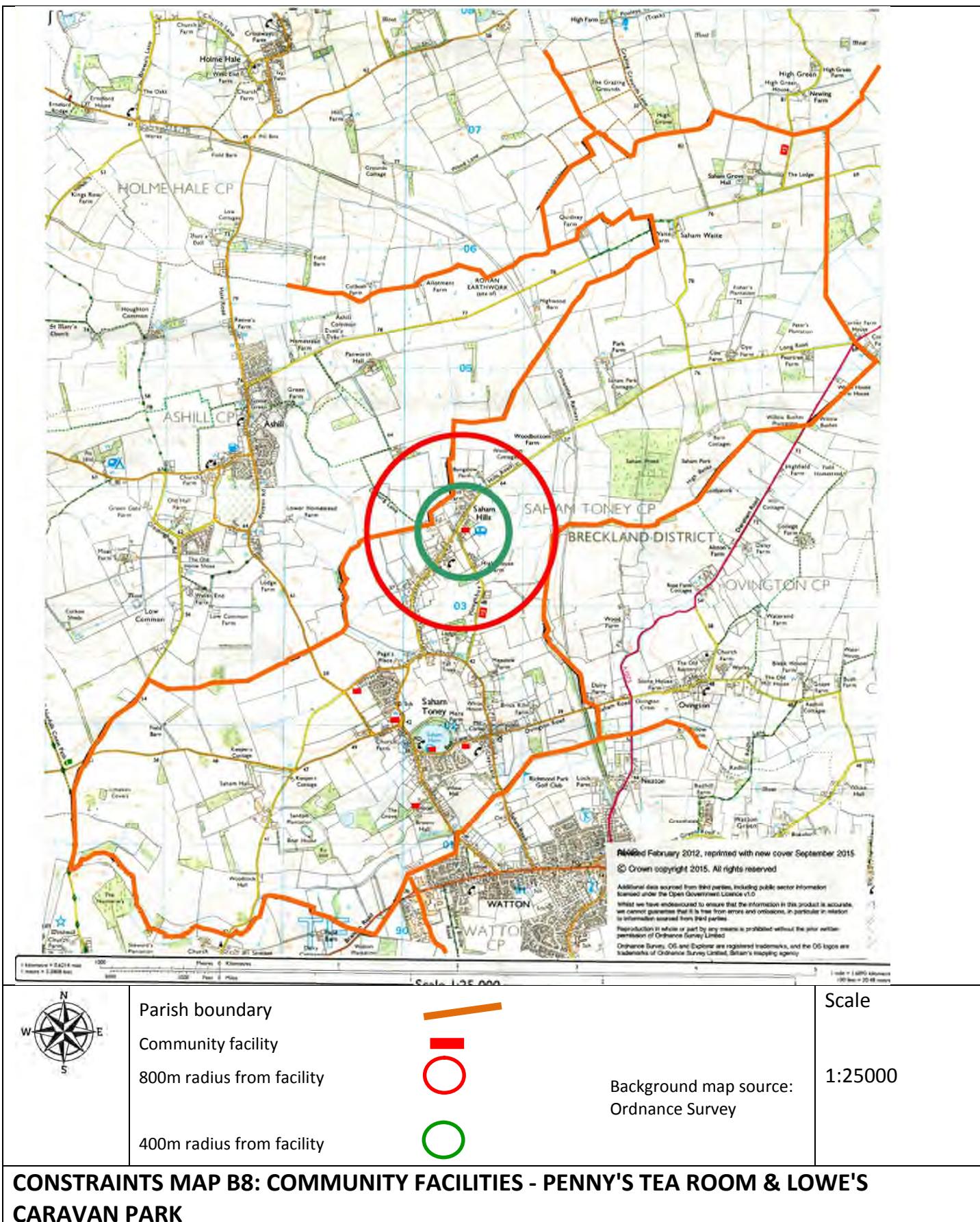
CONSTRAINTS MAP B5: COMMUNITY FACILITIES - SPORTS & SOCIAL CLUB

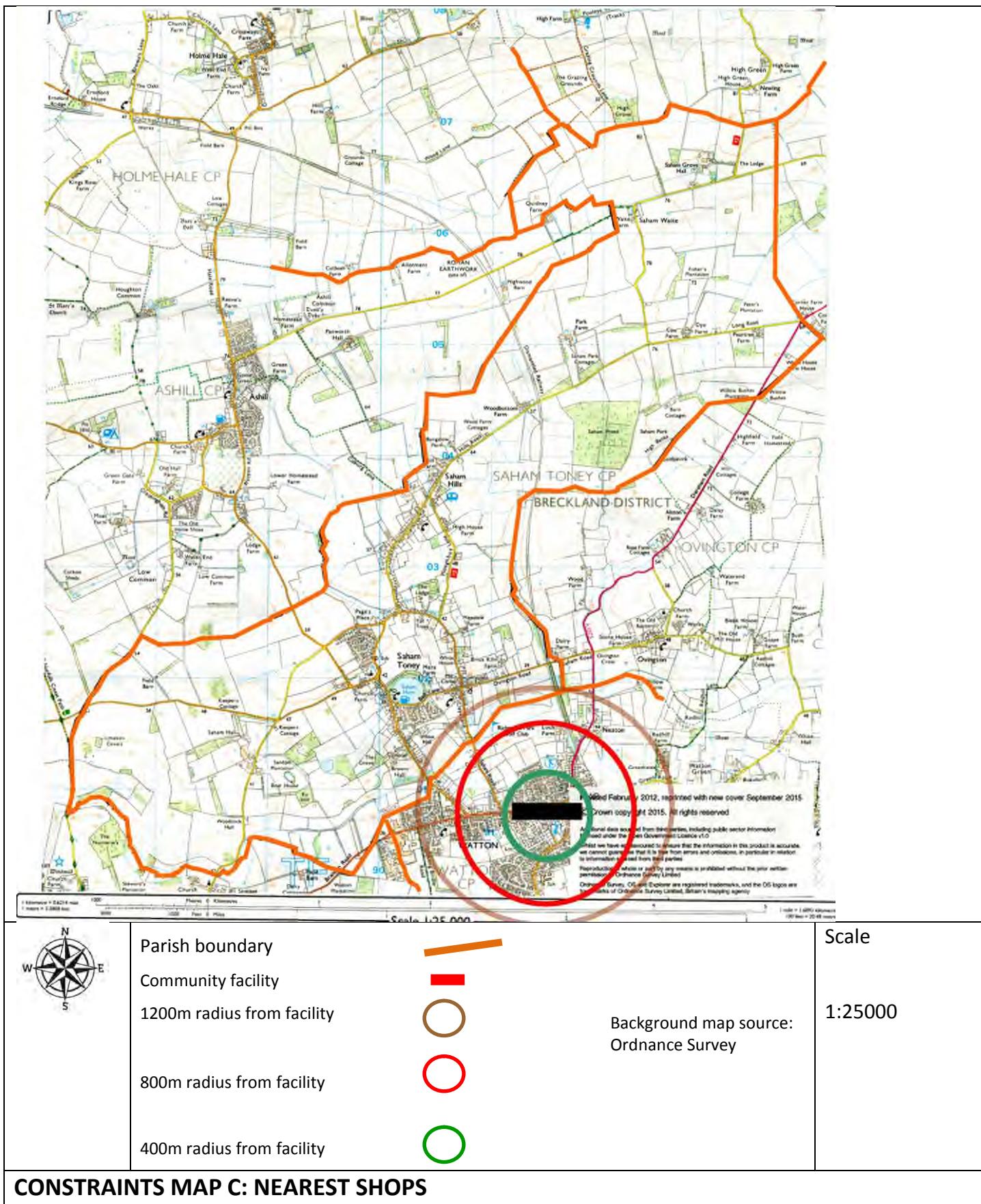


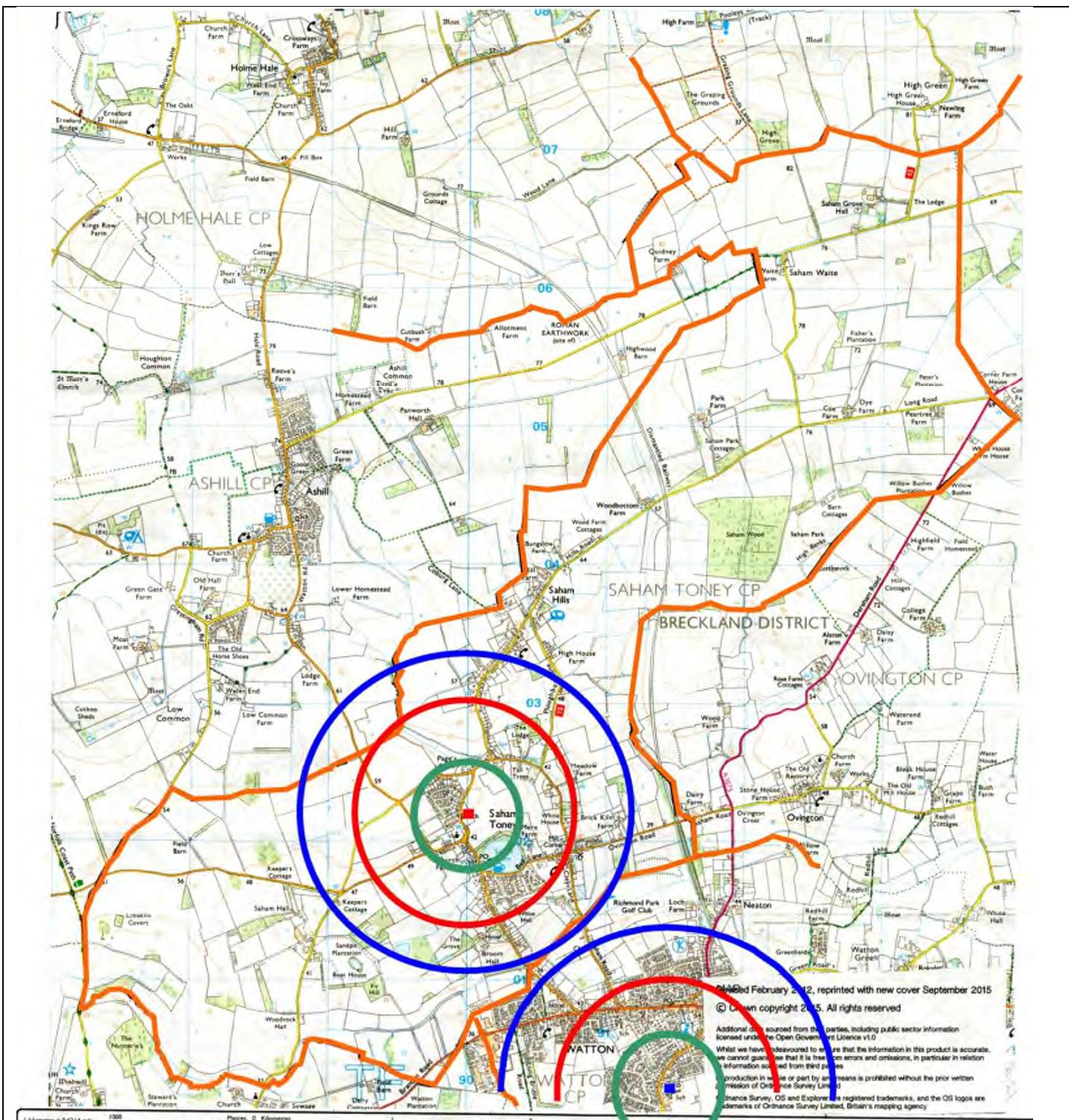
CONSTRAINTS MAP B6: COMMUNITY FACILITIES - BROOM HALL HOTEL



CONSTRAINTS MAP B7: COMMUNITY FACILITIES - THE OLD BELL INN







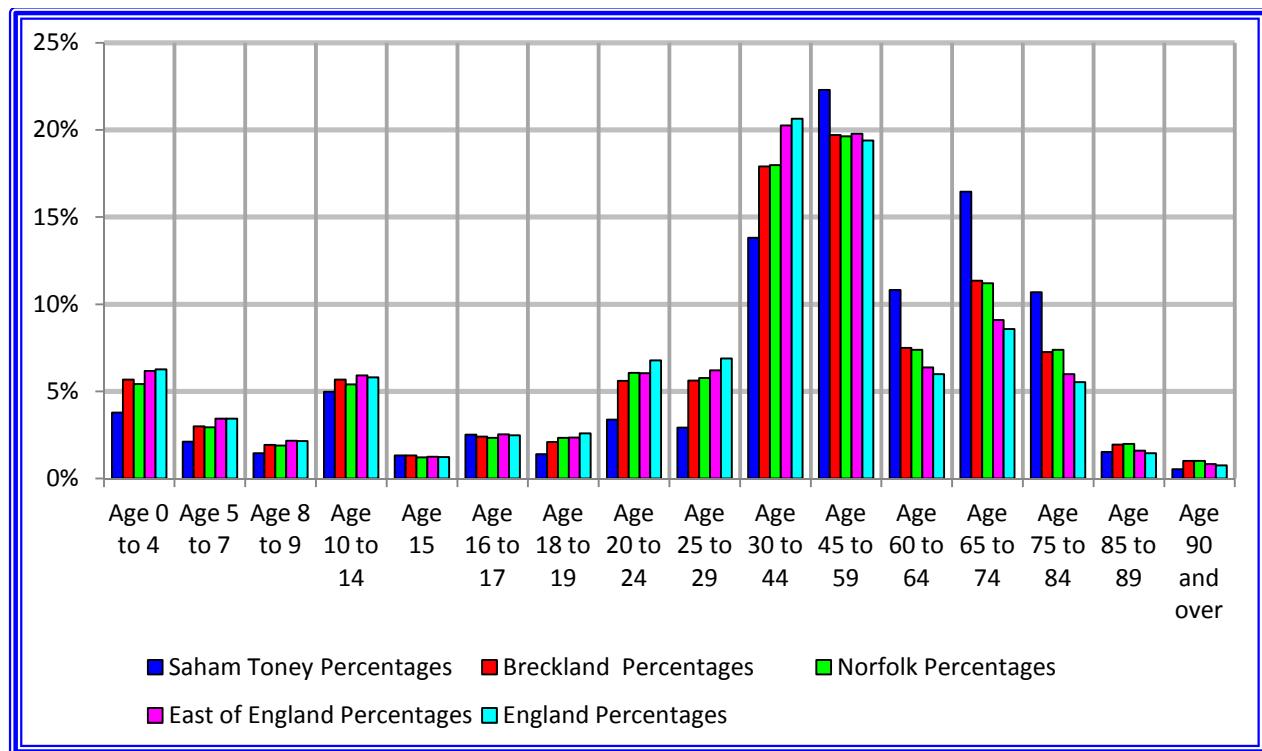
 N W E S	Parish boundary Saham Toney primary school Watton secondary school 400 / 800 / 1200 m radius from school	 	Background map source: Ordnance Survey	Scale 1:25000
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CONSTRAINTS MAP D: LOCAL SCHOOLS

5. Housing Need

5.1 Age Demographics

5.1.1 The results of the 2011 census show that Saham Toney has considerably fewer children and young adults than four comparison areas of Breckland, Norfolk, the East of England or England as a whole. Conversely it has significantly more middle-aged and older people. This is shown in the chart below:



5.1.2 The emerging Local Plan concludes from the demographics for the district that an ageing population will bring a need for smaller accommodation; as older households are typically smaller households, and increase the need for suitable dwellings, such as bungalows.

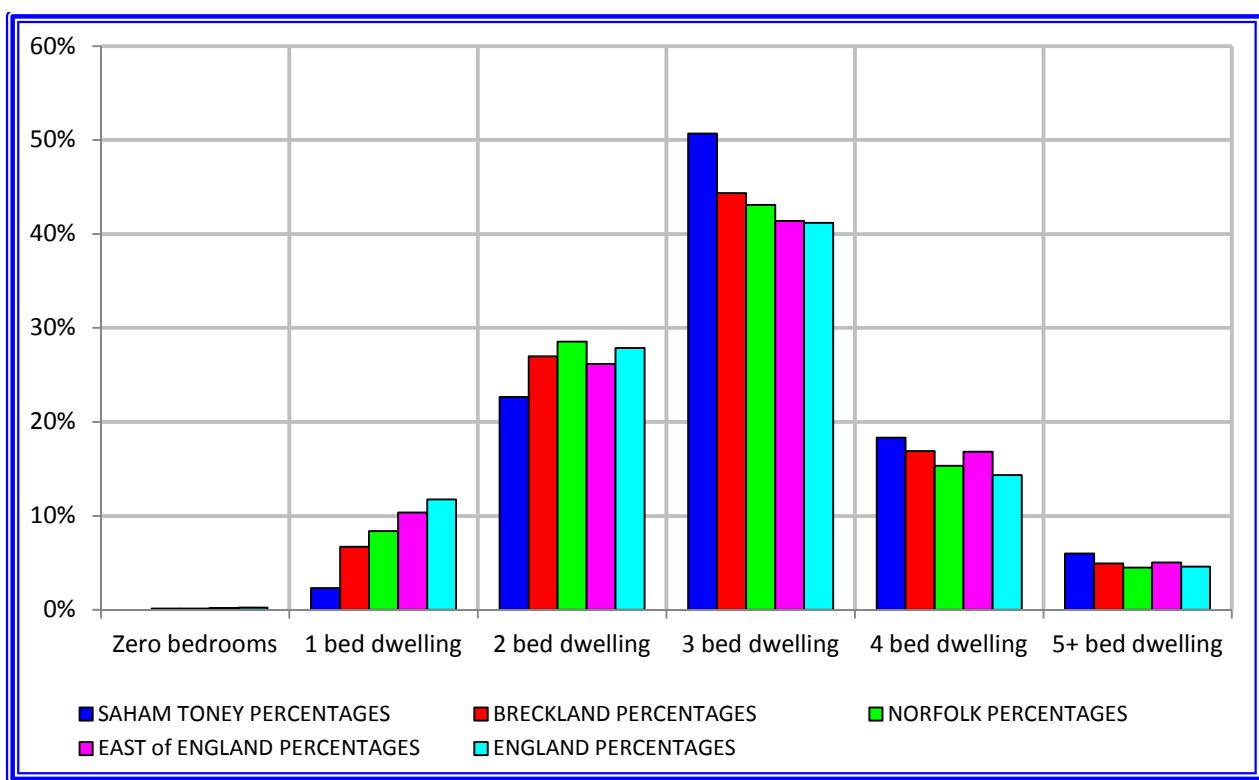
5.1.3 It can be seen from the chart that Saham Toney's demographics are even more weighted towards an ageing population than Breckland's which itself exceeds regional and national figures.

5.1.4 Increase in the population of the area arising from new housing development will increase the demand for facilities. Against a backdrop of an ageing population, this may include a significant degree of special needs access facilities and community transport schemes.

5.1.5 Out-migration of young people and increase in the elderly has been exacerbated by demographic change and will have a major impact on the economy in the future, leading to skills gaps in the economy.

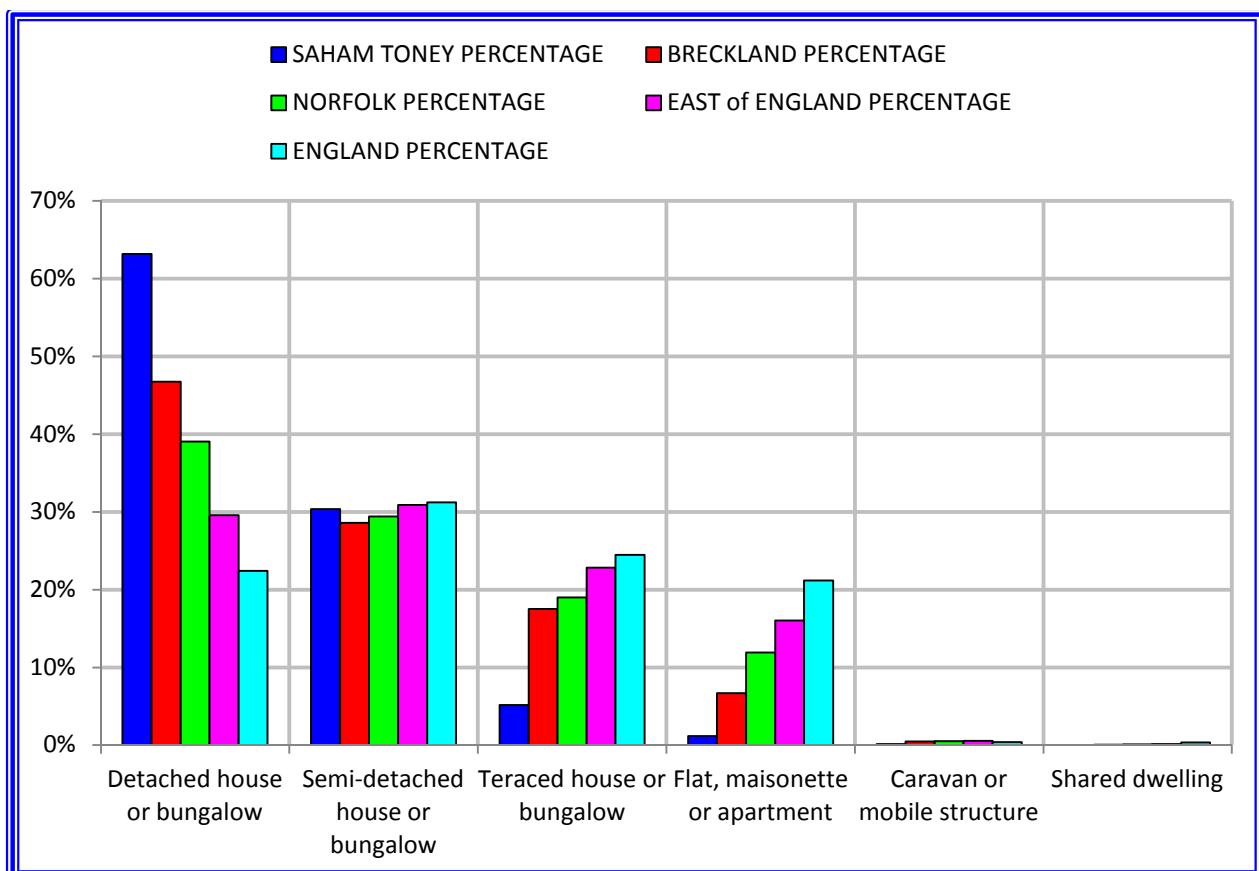
5.2 Dwelling Size Demographics

5.2.1 Saham Toney has more larger dwellings than the four comparison areas and fewer smaller dwellings, as shown on the chart below:



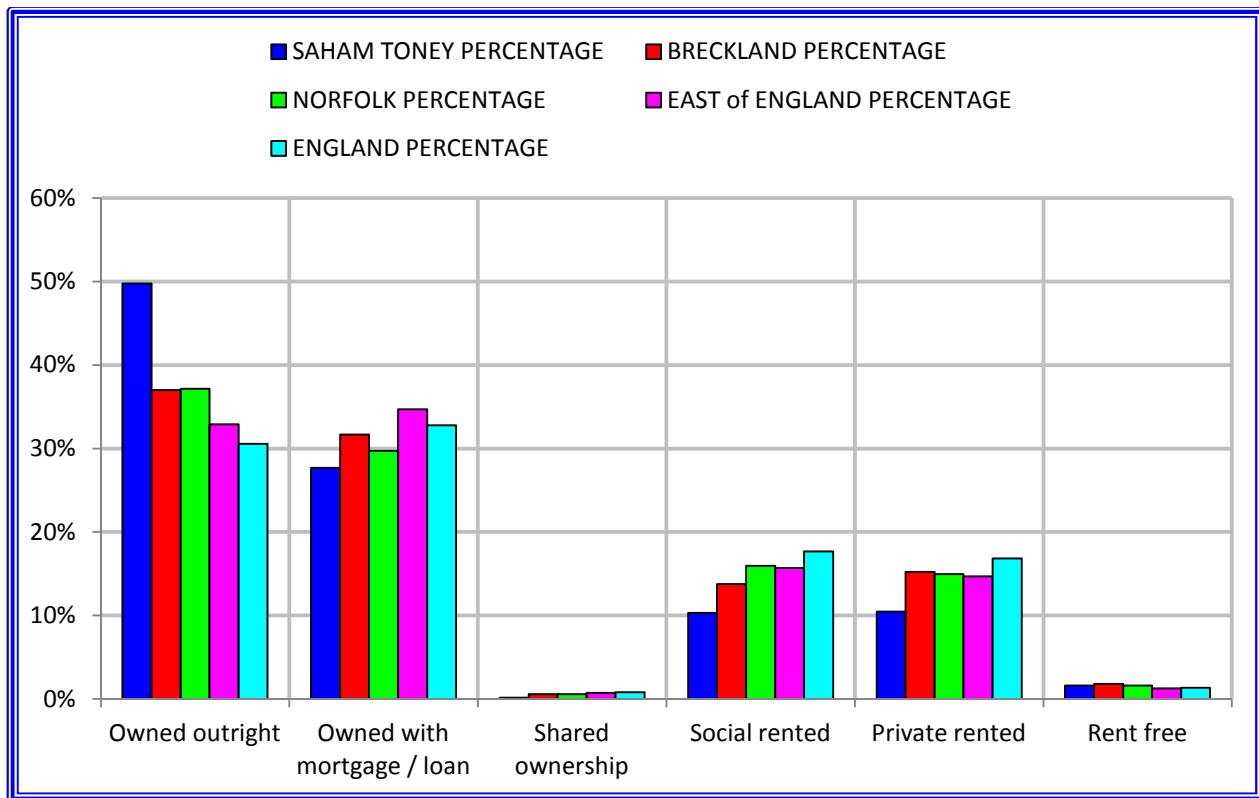
5.3 Dwelling Type Demographics

5.3.1 Dwelling types in Saham Toney differ considerably from those in the four comparison areas, as shown on the chart below:



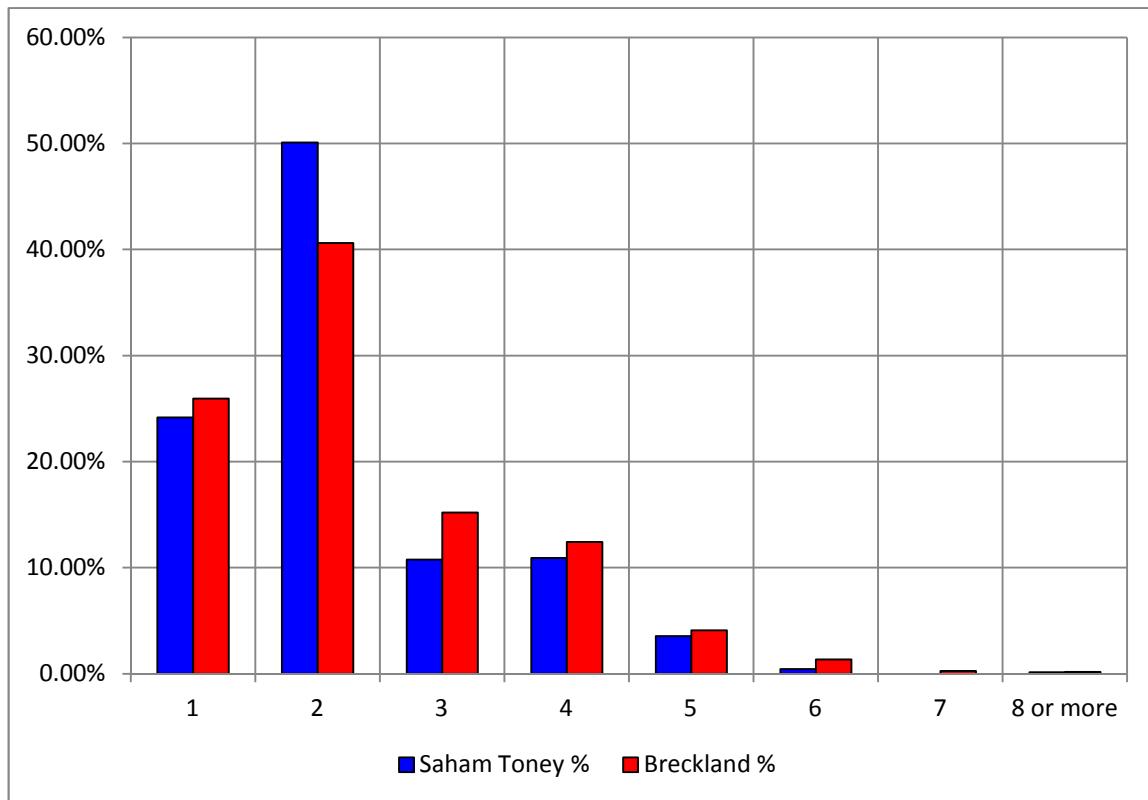
5.4 Housing Tenure Demographics

5.4.1 Housing tenure in Saham Toney differs significantly from that in the four comparison areas, as shown on the chart below:



5.5 People per Household

5.5.1 Saham Toney has a preponderance of 2 person households, much more so than Breckland, and correspondingly less 1, 3 and 4 and above person households, as shown on the chart below:



5.6 Interpretation of Demographic Data

5.6.1 Given the statistical data, it is clear that the housing needs of the Neighbourhood Area cannot be based on an assessment of Breckland district as a whole. New housing must cater specifically for the Neighbourhood Area's needs.

5.6.2 The Neighbourhood Area has an ageing population that in general terms is living in larger properties which they own, either outright or with some form of loan. This lack means both that older residents who wish to downsize their properties but remain in the Area find it difficult to do so; and young adults and families have very limited choice of the type or size of home likely to be within their means.

5.6.3 Although Breckland has a general need for larger properties, the fact that Saham Toney has a proportionally greater number of existing houses with 3 or more bedrooms, combined with an aging population, indicates that any need for 3, 4 or 5 bedroom homes is likely to be satisfied by natural events - i.e. existing houses coming onto the market as older residents pass on.

5.6.4 Housing completion data for the Neighbourhood Area shows that single-storey properties, the preferred form of housing for many older, retired people, and smaller dwellings for first-time buyers, are not being provided in sufficient numbers.

6. Roads and Public Transport

6.1 Roads

6.1.1 The majority of the households in the village are situated adjacent to, or between two main routes; Richmond Road on the west side and Bell Lane, Saham Road, Pages Lane, Chequers Lane, Hills Road and Cley Lane to the east. See Constraints Map E for these western and eastern routes. These two routes link Saham Toney to the neighbouring town of Watton and further afield. Most of the remaining properties are situated adjacent to Hills Road / Long Road or Ovington Road which are single lane roads with passing places. Richmond Road, although a narrow rural road on which it is not possible for HGV's and other large vehicles to pass, is the main route between Watton and Swaffham, with some footpaths and a pedestrian bridge. Speed Watch traffic surveys have recorded more than 2000 vehicles per day on it, in one direction only, with an average speed of 37 mph (the speed limit is 30 mph). This explains why residents are concerned about both the volume and speed of traffic on this residential road with its sharp, blind bends. The eastern routes are also a concern since they are becoming busier and attracting quite heavy vehicles using them as a shortcut to / from their junctions with Richmond Road. The eastern routes have almost no footpaths, making them dangerous for the pedestrians who use them. A single lane bridge on Cley Lane as it passes across the parish boundary towards Watton has no traffic control and has been damaged on numerous occasions by vehicles. Traffic along eastern routes is also damaging road edges, increasing the hazard for both cyclists and pedestrians. As evidenced by responses to preliminary consultations, residents are also concerned about poor visibility at the junctions of (a) Bell Lane, Cley Lane and Ovington Road; (b) Pound Hill and Richmond Road; and (c) Chequers Lane and Mill Corner.

6.1.2 There are particular problems with parking congestion and consequent danger to road users and pedestrians around the primary school at drop-off and pick-up times.

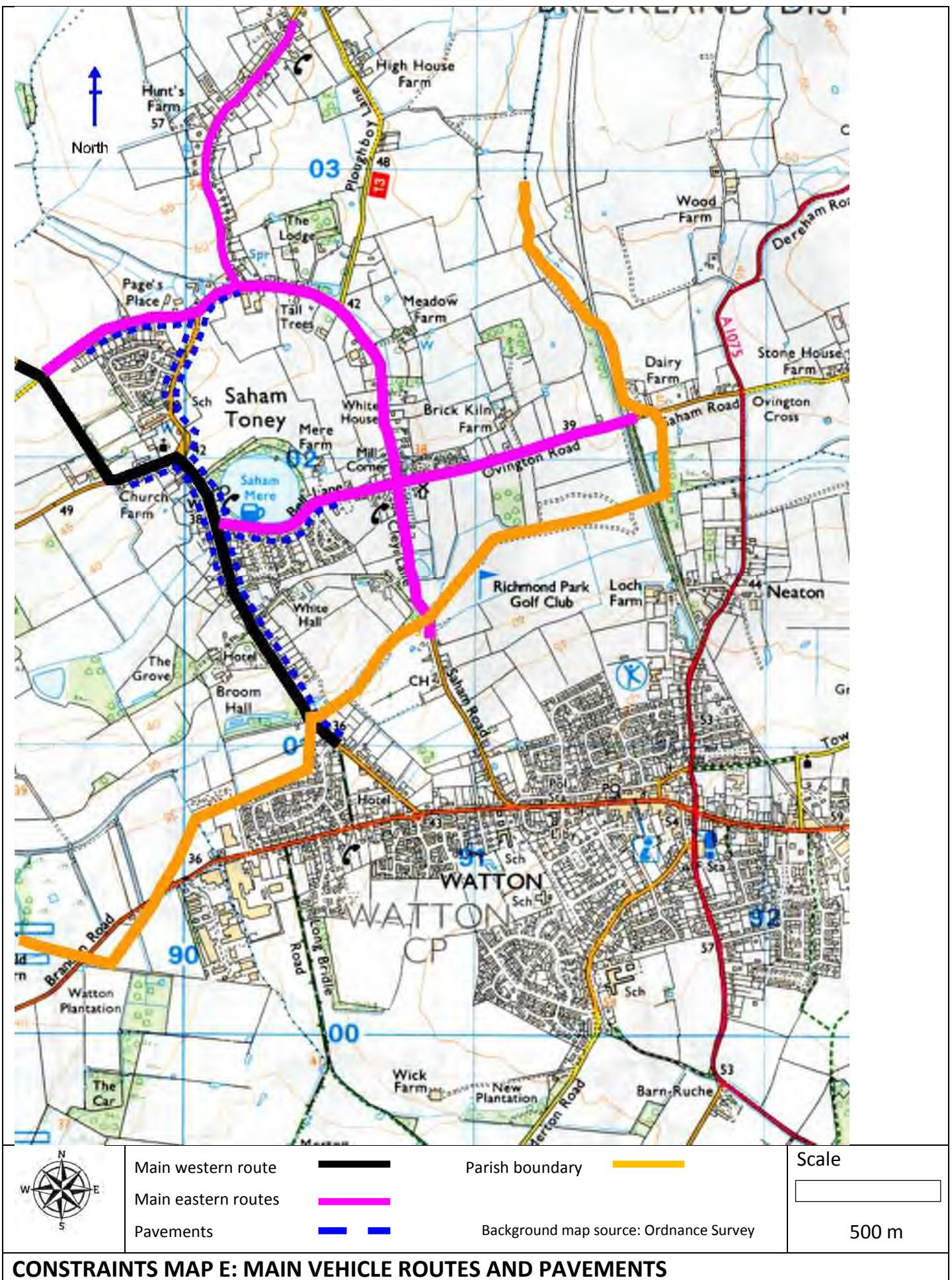
6.1.3 A key consideration when considering the location of proposed developments is safe access to and from a site. In many parts of the Neighbourhood Area this is very difficult to achieve without significant and costly highway improvements. Local roads are generally narrow, lack passing places, are often in poor condition and include a number of blind and obstructed view bends and junctions.

6.2 Public Transport

6.2.1 Saham Toney has an hourly bus service to Watton, Dereham and Swaffham during working hours, although for many parishioners the bus stops are further than Breckland's recommended 1200m maximum walking distance from their homes. The bus route and bus stop walking distance zones are shown on Constraints Map A. This shows that residents living in or near to Cley Lane, Ovington Road, Ploughboy Lane, much of Chequers Lane and Hills Road, and outlying parts of the Neighbourhood Area do not have easy access to the bus service.

6.3 Pedestrian Access

6.3.1 There are presently very few pavements (i.e. raised paved or asphalted paths for pedestrians at the side of a road) along the main routes in the parish. Those that do exist are shown on Constraints Map E. Particularly along the eastern routes there is a lack of safe pedestrian access. This is not simply a convenience issue, but also a safety one. In order to access community facilities, the village primary school, and shops and services in neighbouring Watton on foot, parishioners have very limited opportunity to do so safely. This coupled with the road limitations noted in 6.1 and the limited public transport provision described in 6.2 result in inevitable over-reliance on the use of cars, something that the emerging Local Plan seeks to avoid, and which may mean that those without the benefit of having access to a car experience a degree of social exclusion.



CONSTRAINTS MAP E: MAIN VEHICLE ROUTES AND PAVEMENTS

7. Flood Risk

7.1 Saham Toney experiences flooding due to surface water run-off, groundwater inundation and rivers, brooks and drainage ditches overflowing their banks. Instances of heavy rainfall sometimes also lead to over-loading of the underground drainage sewers, resulting in flood water overflowing from manholes.

7.2 The Environment Agency's online flood risk maps show the main areas affected, and are reproduced on Constraints Maps G and H (as current online on 31 December 2017). These maps do not account for the potential consequences of climate change.

7.3 Additionally many residents in the Neighbourhood Area have reported recent flood events affecting their homes, gardens, surrounding land and village roads. These reports are documented in the Saham Toney Neighbourhood Plan Evidence Base Volume 12. When taken into account it is clear that in practice the surface water flood risk zones extend further than those shown on the Environment Agency's map. A sample of villager photos of flood events are given below:

Richmond Road at Watton Brook 	Hills Road / Ploughboy Lane 	Bell Lane-Cley lane Junction 
Chequers Lane-Hills Road Junction 	Chequers Lane 	Page's Lane 
Chequer's Lane 	Ploughboy Lane 	Ploughboy Lane 

Ploughboy Lane	Ploughboy Lane	Ploughboy Lane
		
Amy's Close / Bell Lane	Cley Lane / Bell Lane/ Ovington Road / Chequers Lane Junction	Cley Lane / Bell Lane/ Ovington Road / Chequers Lane Junction
		
Ovington Road	Ovington Road	Amy's Close / Bell Lane Junction
		

Hills Road north of Saham Hills	Hills Road / Ploughboy Lane Junction	Hills Road / Ploughboy Lane Junction
		
	06/25/2007	06/25/2007

7.4 Surface water flooding happens when rainwater does not soak into the ground or drain away through the normal drainage systems, which locally have a limited capacity, but lies on or flows over the ground instead. It is exacerbated by the generally high groundwater level in the Area and the increased frequency of heavy rainfall in recent years. It is also likely that there will be an increasing risk of surface water flooding in the face of climate change. There is therefore significant concern that future development should not add to the flood risk within the Neighbourhood Area.

7.5 Norfolk County Council's Local Flood Risk Management Strategy, 31 July 2015, estimated that more than one hundred properties in Saham Toney were at risk of surface water flooding. That is a significant proportion (about 13%) of all properties in the Neighbourhood Area, and planning decisions must ensure that development does nothing to make this situation worse.

7.6 Norfolk County Council's draft Flood Investigation Report for Watton and the surrounding area (12 December 2017), covering events of 23 June 2016, includes a section specific to Saham Toney. It shows the watercourse for the Area as given in Constraints Map F.

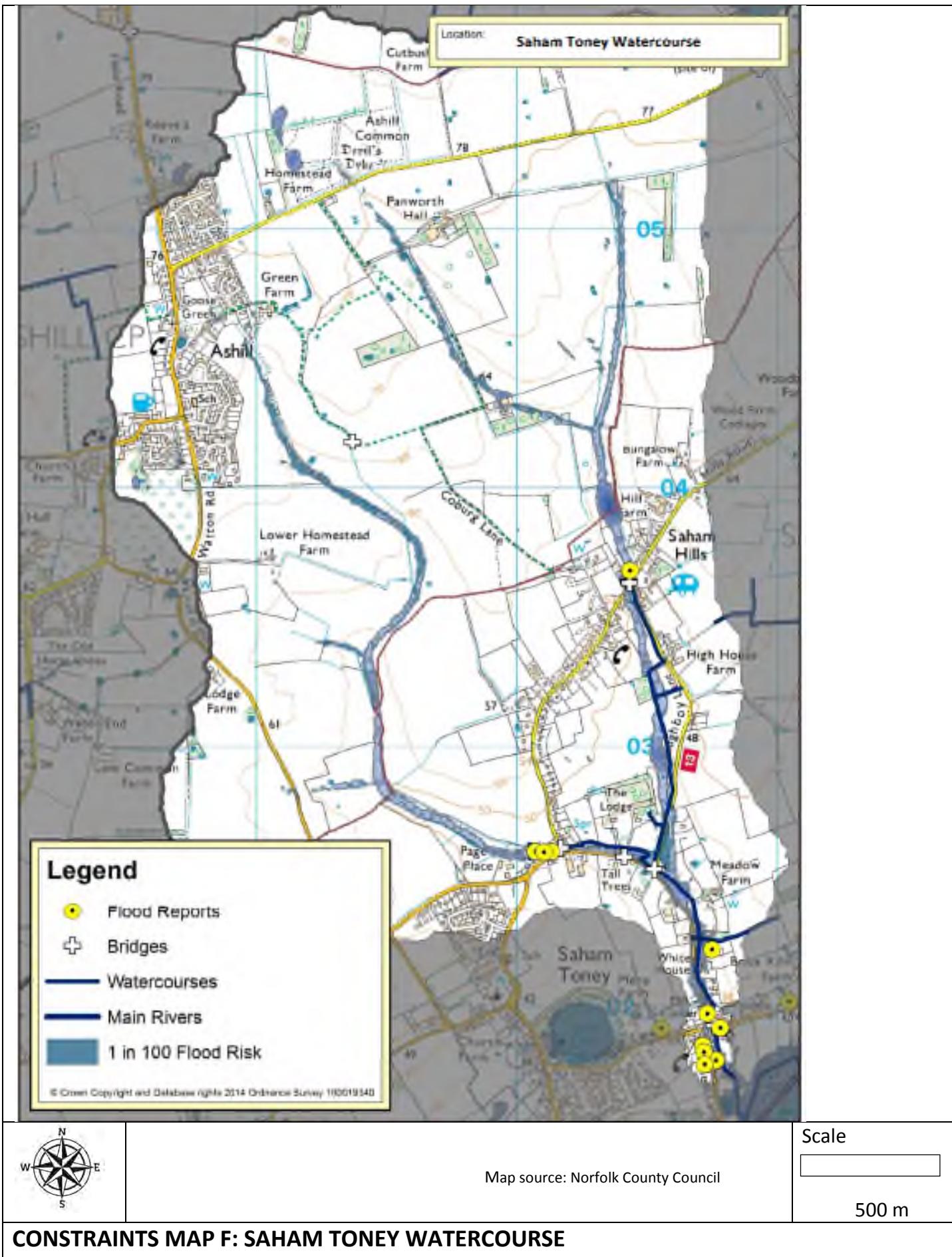
7.7 The Saham Toney watercourse to the north of the village that originates at the Green Farm area of Ashill and converges at the bottom of Pages Lane has seen an increase in flow in recent years with the addition of new housing developments around its source. With a drop of some 30 metres from the source over a distance of just over a mile, the increase in both quantity and flow rate after heavy rain is too much to get through the culvert under the bottom of Hills Road which has been rendered unfit for purpose with overflowing water regularly flooding the Hills Road / Ploughboy Lane junction.

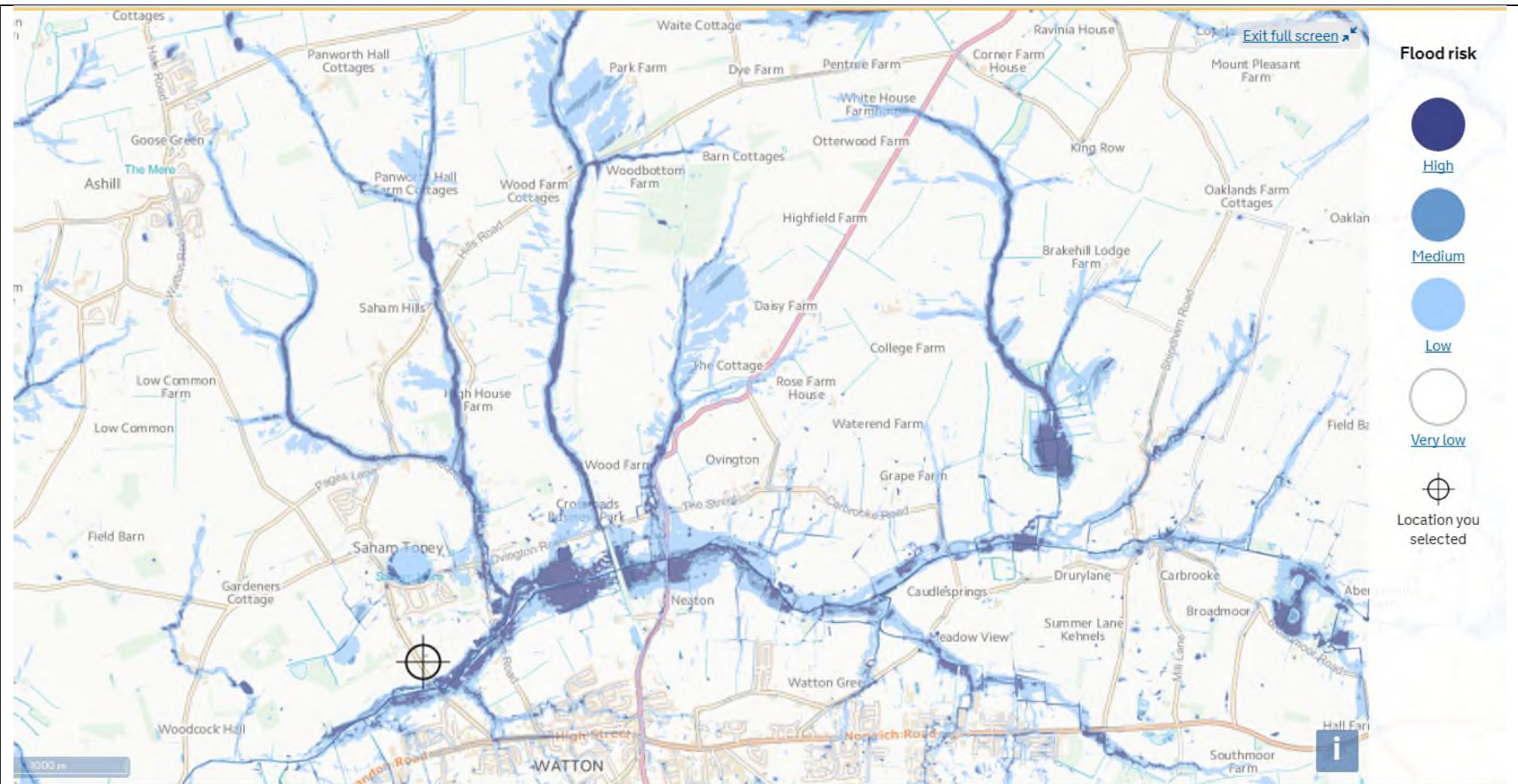
7.8 The County Council report identifies 37 residential and 2 non-residential properties at risk of surface water flooding from a 1 in 30 year event; and a further 63 residential and 2 non-residential properties at risk of surface water flooding from a 1 in 100 year event. The total of 100 residential properties at risk is a significant proportion (about 13%) of all properties in the Neighbourhood Area, and planning decisions must ensure that development does nothing to make this situation worse.

7.9 As a result of flood events on 23 June 2016, Norfolk County Council received 25 reports of flooding in Saham Toney, of which 12 were internal flooding. This was actually just a small proportion of the total, since responses to Neighbourhood plan preliminary consultations included 159 villager reports of flooding on that date.

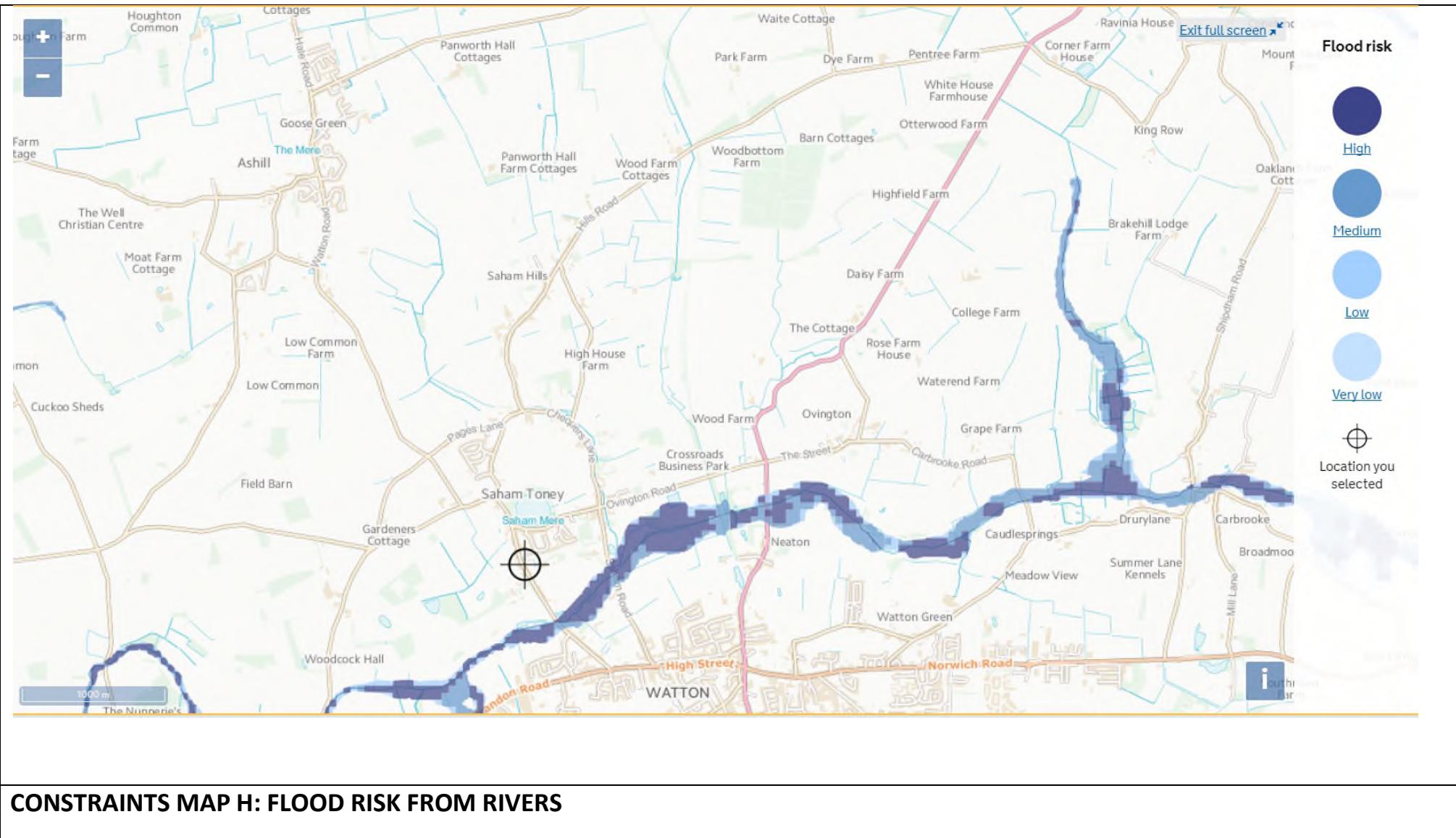
7.10 Further flooding occurred on 27 / 28 December 2017, as reported to the Parish Council, particularly at:

- a. The Hills Road junction with Chequers Lane;
- b. Along Page's Lane;
- c. Richmond Road immediately south of Watton Brook: here the flow of water in the underground sewer was so powerful that it lifted off the manhole cover;
- d. Along Chequer's Lane and Cley Lane: problems in the latter included foul water back-up.





CONSTRAINTS MAP G: SURFACE WATER FLOOD RISK



8. Availability of Suitable Land for Development

8.1 In its document Locational Strategy, Level and Location of Growth and Rural Areas, July 2016, Breckland Council stated that the review of the settlement boundaries would provide scope for small amounts of additional development through the identification of infilling and rounding off opportunities. Since the Saham Toney settlement boundary was not subsequently updated in the emerging Local Plan it must be presumed that no such opportunities were identified.

8.2 In order to promote further flexibility, the emerging Local Plan also proposes a criteria based approach to allow some, **small scale, development** to take place on the edge of the revised settlement boundaries. This is intended to apply in circumstances where by nature of the built form, there are few opportunities for development within the revised boundaries **but a local desire for some further development** to take place. Guidance for the district policy requires that "**Applicants should demonstrate in their statement that there is clear evidence of local support**". This can be done in many ways and the scale of evidence necessary will generally depend on the size and scale of the proposal and its potential impacts. This document sets out the criteria to be considered specifically for the Neighbourhood Area and the Saham Toney Neighbourhood Plan gives greatest weight to those criteria, which are to take precedence over housing allocation numbers, since the latter are not based on a rigorous assessment of specific constraints for all potential development sites in the Area.

8.3 With regard to housing allocation, a reasonable starting point for establishing the potential for development in the Neighbourhood Area is Breckland's Strategic Housing Land Availability Assessment, 2014, which assessed the constrained capacity for development in Saham Toney to be 90 dwellings in the period 2014-2019 and none thereafter for the remainder of the plan period.

8.4 The sites shown on Constraints Map I were assessed by Breckland in 2014. The assessment deemed six sites of the total twenty one assessed to be suitable and achievable for development, with the following constrained capacities:

ST01 - 29: Development complete 2017

ST05 - 10: Application due early 2018 for 3 houses

ST06 - 10: Application for 19 houses refused January 2017

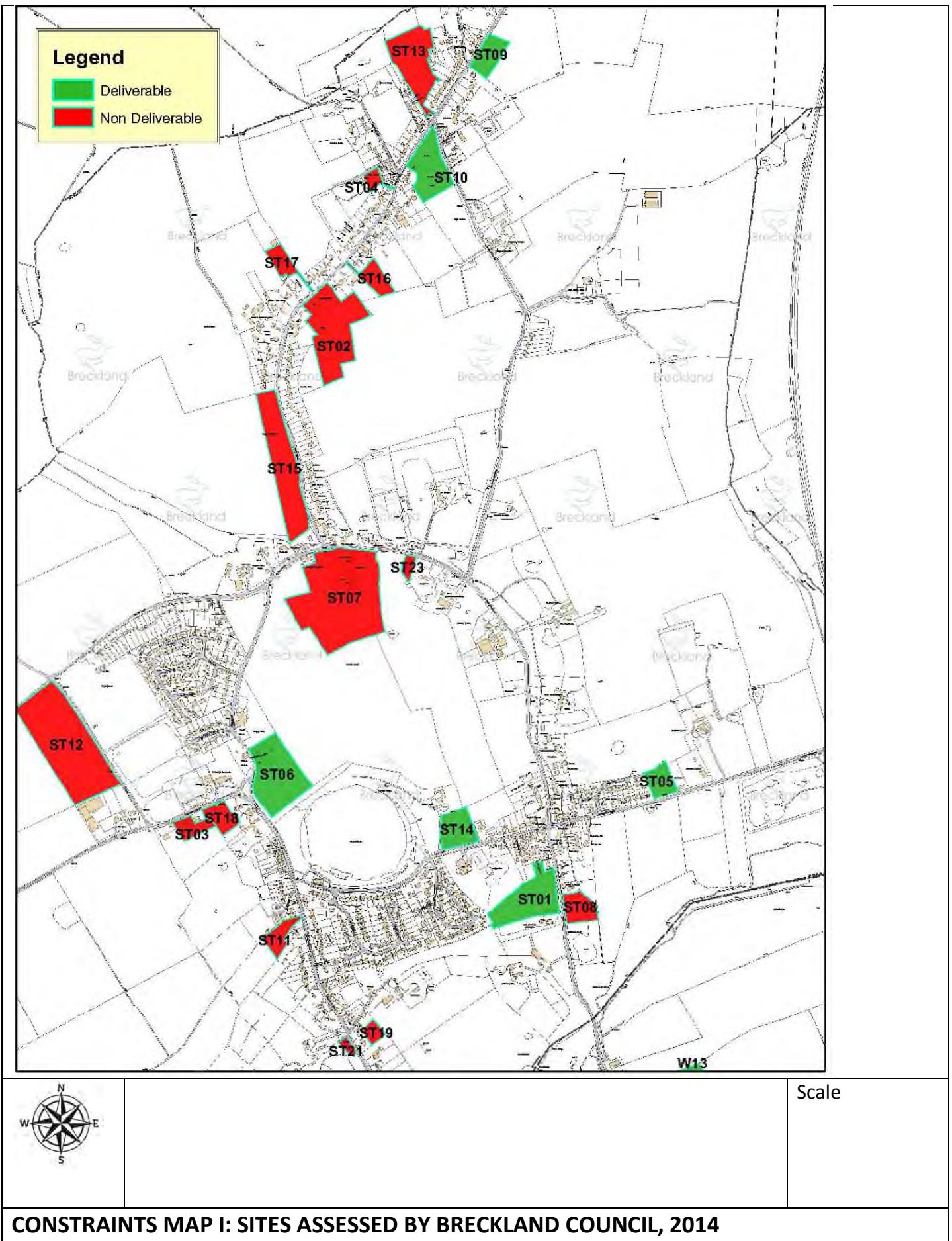
ST09 - 10

ST10 - 21

ST14 - 10

8.5 Given the status of ST01 and ST05, by Breckland Council's own assessment the current constrained capacity for development in Saham Toney is $90 - 29 - 10 = 51$. However this was in the context of Saham Toney's earlier classification as a Local Service Centre. The Neighbourhood Area has since been downgraded in the local development hierarchy to Rural Settlement With Boundary because of its lack of necessary services, specifically a shop and its own post office.

8.6 In the light of this reclassification any development proposal shall be reassessed with regard to both its suitability and constrained capacity for development.





Saham Toney Parish Council 12 March 2018